

# EXHIBIT 2

**ACLU of Utah**

311 S State Suite 310  
Salt Lake City, UT 84111  
United States  
801-871-0329

ACLU of Utah

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**Porter v. Daggett County**
**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
05/03/2017	JM	Document Review	Review intakes from Dustin Porter and Steven Drollette, potential clients, conduct factual research regarding jail.	\$500.00	3.4	\$1,700.00
05/03/2017	JM	Research	Continue to conduct factual research re: jail and IPP program; begin legal research re: Eighth Amendment claims	\$500.00	4.2	\$2,100.00
05/05/2017	JM	Document Preparation	Draft retainer agreements; continue factual and legal research	\$500.00	2.6	\$1,300.00
05/11/2017	JM	Client Meeting	Interview potential clients, finalize and execute agreements	\$500.00	6.7	\$3,350.00
06/05/2017	JM	Document Review	Review intake from potential client Joshua Asay	\$500.00	1.2	\$600.00
06/15/2017	JM	Client Meeting	Review intake from potential client Joshua Olsen. Interview Joshua Olsen	\$500.00	4.5	\$2,250.00
08/14/2017	JM	Client Meeting	Interview Joshua Asay re: facts of his case. Review retainer agreement	\$500.00	5.3	\$2,650.00
11/06/2017	JM	Court Attendance	Attend sentencing of Joshua Cox; prepare notes re: same	\$500.00	2.4	\$1,200.00
12/04/2017	JM	Research	Research Utah Governmental Immunity Act notice of claim requirements; work on draft notice to all defendants	\$500.00	2.5	\$1,250.00
12/07/2017	JM	Document Preparation	Complete work on draft UGIA notice to all Defendants	\$500.00	3.2	\$1,600.00
04/02/2018	JM	Document Preparation	Begin draft demand letter to State and Daggett Defendants for all Plaintiffs; meet w/ Joshua Asay	\$500.00	3.7	\$1,850.00
04/09/2018	JM	Document Review	Finalize demand letter, meet with Olsen and Porter re: same	\$500.00	3.2	\$1,600.00
05/07/2018	JM	Research	Legal research for Drollette/Porter complaint; begin drafting same	\$500.00	6.2	\$3,100.00

05/08/2018	JM	Research	Legal research for Drollette/Porter complaint; continue drafting same	\$500.00	7.6	\$3,800.00
05/09/2018	JM	Research	Speak to Porter and Drollette re facts; continue drafting complaint and legal research re: same	\$500.00	6.3	\$3,150.00
05/10/2018	JM	Research	Continue drafting complaint; continue legal research re: same	\$500.00	7.1	\$3,550.00
05/11/2018	JM	Research	Continue drafting complaint; continue legal research re: same	\$500.00	6.9	\$3,450.00
05/14/2018	JM	Document Preparation	Review draft complaint w/ clients; make revisions re: same	\$500.00	5.2	\$2,600.00
05/15/2018	JM	Document Preparation	Finalize draft complaint; incorporate edits	\$500.00	4.8	\$2,400.00
05/16/2018	JM	Document Review	Help prepare filing-related documents; make final edits; file complaint	\$500.00	2.5	\$1,250.00
05/18/2018	JM	Client Meeting	Meet w/ Josh Asay re: complaint	\$500.00	1.2	\$600.00
05/24/2018	JM	Document Preparation	Begin to draft Asay complaint	\$500.00	1.5	\$750.00
05/25/2018	JM	Research	Continue to draft Asay complaint; conduct legal research re: same	\$500.00	2.6	\$1,300.00
05/28/2018	JM	Document Preparation	Continue drafting Asay complaint; conduct legal research re: same; consult w/ client re: same	\$500.00	6.1	\$3,050.00
05/29/2018	JM	Document Preparation	Continue drafting Asay complaint; consult and incorporate client feedback; continue legal research	\$500.00	6.9	\$3,450.00
05/30/2018	JM	Document Preparation	Finalize draft Asay complaint; prepare filing documents re: same; file same	\$500.00	1.8	\$900.00
06/05/2018	JM	Document Preparation	Begin preparing Amendment complaint for Porter/Drollette	\$500.00	3.2	\$1,600.00
06/06/2018	JM	Communication with Client	Consult clients re: Amended complaint; incorporate feedback; conduct legal research re: same	\$500.00	2.6	\$1,300.00
06/07/2018	JM	Document Preparation	Finalize and file Amended complaint for Drollette/Porter	\$500.00	3.8	\$1,900.00
06/25/2018	JM	Document Review	Review standing Order in Drollette/Porter	\$500.00	0.5	\$250.00
08/02/2018	JM	Research	Review Daggett Defendants' answers in both cases; conduct legal research : affirmative defenses	\$500.00	2.7	\$1,350.00
08/03/2018	JM	Document Review	Review State Defendants' Motions to Dismiss in both cases	\$500.00	2.4	\$1,200.00
08/06/2018	JM	Drafting Motion	Begin drafting response to State Defendants' MTDs; legal research re: same; review Lail answers to complaints	\$500.00	3.5	\$1,750.00
08/07/2018	JM	Drafting Motion	Continue legal research and drafting opp to State Defendants' MTD	\$500.00	4.2	\$2,100.00
08/10/2018	JM	Research	Review Daggett Defendants' motion to consolidate; begin legal research re: same	\$500.00	1.9	\$950.00
08/23/2018	JM	Drafting Motion	Continue legal research re: consolidation; begin drafting opposition to Daggett Def's MTC	\$500.00	5.1	\$2,550.00
08/24/2018	JM	Drafting Motion	Finalize and file opposition to Daggett Defs' MTC	\$500.00	1.4	\$700.00
09/07/2018	JM	Client Meeting	Meet w/ Dustin Porter and Steven Drollette re: MTC	\$500.00	3.9	\$1,950.00
09/10/2018	JM	Drafting Motion	Continue drafting opp to State Defs MTD; legal research re: same	\$500.00	5.3	\$2,650.00
09/11/2018	JM	Drafting Motion	Continue drafting opp to State Defs MTD; legal research re: same	\$500.00	4.1	\$2,050.00

09/12/2018	JM	Document Preparation	Continue drafting opp to State Defs MTD; legal research re: same	\$500.00	3.3	\$1,650.00
09/13/2018	JM	Drafting Motion	Continue drafting opp to State Defs MTD; legal research re: same	\$500.00	2.9	\$1,450.00
09/14/2018	JM	Drafting Motion	Finalize and file opp to State Defs MTD	\$500.00	1.7	\$850.00
10/01/2018	JM	Document Review	Review court order on MTC; correspond w/ clients re: same	\$500.00	0.2	\$100.00
10/16/2018	JM	External Meeting	Meet w/ Logan Walker re: declaration and draft same	\$500.00	6.3	\$3,150.00
10/18/2018	JM	Document Review	Review State Defs reply iso MTD; legal research re: same	\$500.00	3.4	\$1,700.00
12/17/2018	JM	Hearing Preparation	Prepare for hearing on State Defs MTD in Asay case	\$500.00	2.1	\$1,050.00
12/18/2018	JM	Court Attendance	Finalize preparation and attend hearing on State Defs MTD in Asay Case	\$500.00	4.2	\$2,100.00
01/09/2019	JM	Document Review	Review State Defs notice of supp authority re: MTD; legal research re: same	\$500.00	1.9	\$950.00
01/11/2019	JM	Document Review	Review Court order on State Defs MTD in Asay Case; conduct legal research re: same	\$500.00	2.5	\$1,250.00
01/18/2019	JM	Drafting Motion	Research, draft, and prepare notice of supplemental authority in MTD	\$500.00	2.7	\$1,350.00
04/03/2019	JM	Document Review	Review and approve stipulated mediation order	\$500.00	0.6	\$300.00
05/28/2019	JM	Document Review	Review court order re: mediation; correspond w/ clients re: same	\$500.00	0.3	\$150.00
08/12/2019	JM	External Meeting	Prepare for and meet and confer w/ opposing counsel re: joint settlement submission	\$500.00	2.1	\$1,050.00
08/15/2019	JM	External Meeting	Attend scheduling order meet and confer w/ opposing counsel in Asay; prepare for same	\$500.00	0.6	\$300.00
08/16/2019	JM	Document Review	Review joint party submission for mediation	\$500.00	1.1	\$550.00
08/21/2019	JM	Document Review	Review Daggett Defs Second Motion to consolidate; legal research re: same	\$500.00	2.6	\$1,300.00
09/02/2019	JM	Drafting Motion	Begin drafting opp to Daggett Defs second MTC; legal research re: same	\$500.00	1.8	\$900.00
09/03/2019	JM	Drafting Motion	Continue drafting opp to Daggett Defs second MTC; legal research re: same	\$500.00	2.0	\$1,000.00
09/04/2019	JM	Drafting Motion	Finalize and file opp to Daggett Defs second MTC	\$500.00	1.4	\$700.00
09/07/2019	JM	Document Preparation	Begin drafting clients' confidential mediation statement	\$500.00	3.1	\$1,550.00
09/08/2019	JM	Document Preparation	Continue drafting clients' confidential mediation statement: legal research re: same	\$500.00	2.8	\$1,400.00
09/09/2019	JM	Document Preparation	Finalize and submit client's confidential mediation statement	\$500.00	1.5	\$750.00
09/13/2019	JM	External Meeting	Attend scheduling order meet and confer w/ opposing counsel in Asay; prepare for same	\$500.00	1.3	\$650.00
09/18/2019	JM	Document Review	Review Daggett Defs reply iso second MTC; legal research re: same	\$500.00	2.3	\$1,150.00
09/23/2019	JM	Client Meeting	Meet w/ Asay re: initial disclosures; begin to draft same	\$500.00	2.6	\$1,300.00
09/24/2019	JM	Document Preparation	Continue to draft Asay initial disclosures	\$500.00	1.4	\$700.00
09/25/2019	JM	Document Preparation	Finalize Asay initial disclosures; consult w/ client re: same; send same	\$500.00	2.2	\$1,100.00

09/27/2019	JM	Client Meeting	Meet w/ clients to prepare for court ordered mediation; review Daggett Def's initial disclosures in Asay; prepare motion to require Josh Asay to attend mediation; draft proposed order re: same	\$500.00	5.6	\$2,800.00
09/30/2019	JM	Mediation	Attend and participate in mediation; consult w/ clients re: same	\$500.00	6.5	\$3,250.00
11/13/2019	SW	Document Preparation	Preparation of interrogatories and subpoenas for Daggett County, Jerry Jorgensen, and UDC	\$225.00	5.0	\$1,125.00
11/14/2019	JM	Drafting Motion	Review and edit discovery requests to Daggett, Jorgensen and DOC	\$500.00	1.8	\$900.00
12/13/2019	JM	Correspondance	Correspondence w/ opposing counsel re: subpoena to DOC	\$500.00	0.2	\$100.00
12/20/2019	JM	Internal Meeting	Prepare for and attend attorney planning meeting	\$500.00	1.5	\$750.00
12/24/2019	JM	Drafting Motion	Prepare stipulated motion to modify scheduling order in Asay; correspond w/ F. Mylar re: same	\$500.00	0.6	\$300.00
01/13/2020	JM	Drafting Motion	Prepare and file motion to amend scheduling order in Asay; prepare proposed order re: same; draft and approve report of attorney planning meeting in Porter	\$500.00	1.8	\$900.00
01/17/2020	JM	Client Meeting	Meet w/ clients in Drollette/Porter re: initial disclosures; begin drafting same	\$500.00	3.2	\$1,600.00
01/20/2020	JM	Document Preparation	Continue drafting initial disclosures in Drollette/Porter case	\$500.00	3.0	\$1,500.00
01/21/2020	JM	Document Preparation	Finalize and deliver initial disclosures in Drollette/Porter Case	\$500.00	0.9	\$450.00
01/23/2020	JM	Document Preparation	Finalize and transmit subpoena to DOC	\$500.00	2.2	\$1,100.00
02/05/2020	JM	Drafting Motion	Review draft modified protective order allowing State Defs to release relevant records under GRAMA; correspondence re: same	\$500.00	1.6	\$800.00
03/02/2020	JM	Document Review	Review of initial batch of documents produced by State Defendants	\$500.00	3.5	\$1,750.00
03/03/2020	JM	Document Review	Continue review of initial batch of documents	\$500.00	1.2	\$600.00
03/10/2020	JM	Document Review	Review discovery requests from Daggett County to clients; correspondence w/ clients re: same	\$500.00	1.6	\$800.00
04/30/2020	JM	Correspondance	Correspondence w/ opposing counsel re: modifying scheduling order in Asay	\$500.00	0.3	\$150.00
06/11/2020	JM	Drafting Motion	Finalize and file motion to amend scheduling order in Asay and Porter	\$500.00	0.3	\$150.00
06/16/2020	JM	Drafting Motion	Draft modified motion to alter scheduling order in Porter and proposed order; correspondence w/ opposing counsel re: same	\$500.00	1.1	\$550.00
06/23/2020	JM	Drafting Motion	Finalize modified motion and proposed order in Porter, file same	\$500.00	0.6	\$300.00
07/28/2020	JM	Client Meeting	Meet w/ Steven Drollette re: Daggett's document requests and interrogatories	\$500.00	2.5	\$1,250.00
07/29/2020	JM	Drafting Motion	Draft Plaintiffs' responses to discovery requests; correspondence w/ clients re: same	\$500.00	2.7	\$1,350.00
07/31/2020	JM	Drafting Motion	Finalize discovery request responses for Drollette and Porter, send to Daggett	\$500.00	1.8	\$900.00
08/28/2020	JM	Correspondance	Correspondence w/ DOC re: document production	\$500.00	0.2	\$100.00
09/01/2020	SW	Document Review	Reviewing UDC discovery production	\$225.00	3.0	\$675.00

09/01/2020	JM	Document Preparation	Prepare Asay's second set of discovery requests to Daggett; transmit same	\$500.00	2.3	\$1,150.00
09/02/2020	SW	Document Review	Reviewing UDC discovery production	\$225.00	3.0	\$675.00
09/02/2020	SW	Document Review	Reviewing UDC discovery production	\$225.00	5.0	\$1,125.00
09/04/2020	SW	Document Review	Reviewing UDC production	\$225.00	4.0	\$900.00
09/07/2020	SW	Document Review	Reviewing UDC document production	\$225.00	4.0	\$900.00
09/09/2020	JM	Document Review	Start reviewing second batch of UDC produced documents (including about 10,000 pages and numerous recorded interviews and video recordings)	\$500.00	28.0	\$14,000.00
09/10/2020	SW	Document Review	Review UDC discovery production	\$225.00	2.0	\$450.00
09/10/2020	JM	Document Review	Continue review of UDC -produced documents	\$500.00	2.4	\$1,200.00
09/11/2020	JM	Document Review	Continue review of documents produced by UDC	\$500.00	3.8	\$1,900.00
09/22/2020	SW	Deposition preparation	Deposition preparation for Bryan Thompson	\$225.00	3.0	\$675.00
09/22/2020	JM	Drafting Motion	Prepare draft motion and order to extend discovery; correspond w/ Daggett re: same	\$500.00	1.8	\$900.00
09/23/2020	JM	Correspondance	Correspondence w/ Daggett re: discovery extension motion	\$500.00	0.2	\$100.00
09/24/2020	JM	Drafting Motion	Finalize and file discovery extension motion	\$500.00	0.3	\$150.00
09/29/2020	JM	Deposition preparation	Assist w/ Pallesen prep	\$500.00	0.4	\$200.00
09/30/2020	SW	Deposition preparation	Preparation for Keri Pallesen deposition	\$225.00	1.0	\$225.00
09/30/2020	SW	Deposition	Deposition of Keri Pallesen	\$225.00	1.5	\$337.50
09/30/2020	JM	Deposition	Attend and assist w/ Pallesen deposition	\$500.00	1.5	\$750.00
10/01/2020	SW	Research	Researching damages and municipal liability	\$225.00	9.0	\$2,025.00
10/22/2020	SW	Deposition	Preparing for and taking deposition of Holly Dick	\$225.00	4.0	\$900.00
10/23/2020	SW	Deposition	Taking deposition of Bryan Thompson	\$225.00	3.0	\$675.00
10/23/2020	JM	Deposition	Attend and assist with depositions of Holly Dick and Brian Thompson	\$355.00	8.2	\$2,911.00
10/26/2020	JM	Document Review	Continue review of documents produced by UDC	\$500.00	3.1	\$1,550.00
10/27/2020	JM	Document Review	Listen to audio recordings provided by UDC of interviews w/ Daggett Jail Staff	\$500.00	4.5	\$2,250.00
12/11/2020	JM	Client Meeting	Meet w/ client Drollette to prep for deposition	\$500.00	3.7	\$1,850.00
12/14/2020	JM	Client Meeting	Meet w/ client Drollette before and after deposition, defend client deposition	\$500.00	3.3	\$1,650.00
01/08/2021	JM	Deposition preparation	Prepare for Lail depo, including listening to audio and reviewing documents	\$500.00	6.8	\$3,400.00
01/11/2021	JM	Deposition	Finalize, prep for, and depose Lail	\$500.00	8.3	\$4,150.00
01/13/2021	JM	External Meeting	Meet and confer w/ counsel re: depositions	\$500.00	0.5	\$250.00
01/22/2021	JM	Document Review	Review and approve Def's motion re: extension of time	\$500.00	0.2	\$100.00
02/02/2021	JM	Document Review	Review Daggett's third motion to consolidate	\$500.00	0.5	\$250.00
02/11/2021	JM	Deposition	Prepare for and attend Olsen depo	\$500.00	1.7	\$850.00

02/17/2021	JM	Drafting Motion	Prepare, finalize, and file response to motion to consolidate	\$500.00	1.1	\$550.00
02/18/2021	SW	Document Preparation	Dimick declaration preparation	\$225.00	3.0	\$675.00
02/23/2021	JM	Deposition preparation	Prepare for Jorgensen depo, including listening to audio and review documents (6.9); assist w/ Larsen deposition (.4)	\$500.00	7.3	\$3,650.00
02/24/2021	JM	Deposition	Finalize, prep for, and depose Jorgensen	\$500.00	7.2	\$3,600.00
02/25/2021	JM	Deposition preparation	Prepare for deposition of C. Collett	\$500.00	3.7	\$1,850.00
02/26/2021	SW	Document Preparation	Preparing discovery requests for Daggett County	\$225.00	1.5	\$337.50
02/26/2021	JM	Deposition	Finish preparing for and take Collett deposition	\$500.00	4.2	\$2,100.00
03/11/2021	JM	Deposition	Meet w/ Joshua Asay to prepare for deposition, defend Asay Deposition	\$355.00	2.9	\$1,029.50
03/12/2021	JM	Client Meeting	Meet w/ Josh Assay before and after deposition, defend Assay deposition	\$500.00	3.1	\$1,550.00
03/17/2021	MN	Document Management	Index #1 = and moving to MC index	\$130.00	5.0	\$650.00
03/25/2021	JG	Case strategy discussion	Legal team discussed strategy for deposition of Adam Gonzalez scheduled for April 1, 2021.	\$0.00	0.8	\$0.00
03/25/2021	VD	Internal Meeting	Legal team meeting to discuss deposition strategy with Gonzalez	\$0.00	0.8	\$0.00
03/29/2021	SW	Deposition preparation	Preparation for deposition of Margery Hullinger	\$225.00	1.0	\$225.00
03/29/2021	JM	Drafting Motion	Prepare stipulated extension motion and proposed order	\$500.00	0.5	\$250.00
03/30/2021	SW	Deposition	Deposition of Margery Hullinger	\$225.00	2.0	\$450.00
03/30/2021	SW	Deposition preparation	Preparing discovery guidance memo	\$225.00	5.0	\$1,125.00
03/30/2021	JM	Deposition	Attend and assist w/ Margery Hullinger deposition	\$500.00	2.1	\$1,050.00
03/31/2021	JG	Document Review	Reviewed documents for Adam Gonzales deposition on 4.1.21	\$200.00	1.0	\$200.00
03/31/2021	JG	Case strategy discussion		\$200.00	0.5	\$100.00
03/31/2021	JG	Document Review	Document review for Adam Gonzales deposition on 4.1.21	\$200.00	0.6	\$120.00
03/31/2021	JG	Deposition preparation	document review and question drafting for Adam Gonzales deposition on 4.1.21	\$200.00	6.5	\$1,300.00
04/01/2021	JG	Deposition	Took deposition of Adam Gonzalez.	\$200.00	2.2	\$440.00
04/15/2021	JM	Deposition preparation	Prep for Dupaix deposition; review supplemental document production by Daggett	\$500.00	3.6	\$1,800.00
04/16/2021	JM	Deposition	Finish preparing for and take Dupaix deposition	\$500.00	2.8	\$1,400.00
04/19/2021	MN	Document Management	Index	\$130.00	1.0	\$130.00
04/20/2021	MN	Document Management	Index	\$130.00	2.0	\$260.00
04/21/2021	MN	Document Management	Index	\$130.00	1.0	\$130.00
04/22/2021	MN	Document Management	Index	\$130.00	0.3	\$39.00



04/23/2021	MN	Document Management	Index	\$130.00	1.0	\$130.00
04/26/2021	MN	Document Management	discovery document mgmt - index	\$130.00	1.4	\$182.00
04/26/2021	MN	Correspondance	email DP GF re contact	\$130.00	0.6	\$78.00
04/27/2021	MN	Document Management	Discovery Index	\$130.00	1.1	\$143.00
04/28/2021	MN	Document Management	Discovery Index	\$130.00	2.4	\$312.00
05/03/2021	JM	Correspondance	Correspondence w/ cons. pl and def counsel re: extension	\$500.00	0.2	\$100.00
05/11/2021	MN	Document Management	discovery index	\$130.00	1.2	\$156.00
05/11/2021	MN	Deposition preparation	Notice of Deposition - Housley	\$130.00	1.3	\$169.00
05/11/2021	MN	Document Management	Discovery Index	\$130.00	1.0	\$130.00
05/12/2021	MN	Document Management	Discovery Index	\$130.00	0.4	\$52.00
05/17/2021	MN	Document Management	Discovery Index	\$130.00	1.8	\$234.00
05/18/2021	MN	Document Management	Discovery Index	\$130.00	0.7	\$91.00
05/18/2021	SW	Document Preparation	Preparing discovery request for server search	\$225.00	1.0	\$225.00
05/24/2021	MN	Document Management	Discovery Index	\$130.00	0.8	\$104.00
05/24/2021	SW	Deposition preparation	Deposition preparation for Drew Housley	\$225.00	6.0	\$1,350.00
05/24/2021	JM	Deposition preparation	Assist w/ Housely deposition prep	\$500.00	1.9	\$950.00
05/25/2021	MN	Document Management	Discovery Index	\$130.00	1.6	\$208.00
05/25/2021	MN	Deposition	deposition - Housley	\$130.00	3.0	\$390.00
05/25/2021	SW	Deposition	taking deposition of Drew Housley	\$225.00	4.5	\$1,012.50
05/25/2021	JM	Deposition	Attend and assist with Housely deposition	\$500.00	4.5	\$2,250.00
05/27/2021	SW	Deposition preparation	Preparing for deposition of Josh Cox	\$225.00	6.0	\$1,350.00
05/28/2021	JG	Drafting Motion	Drafted motion for deposition notice under FRCP 30(b)(6).	\$200.00	1.7	\$340.00
06/07/2021	JG	Deposition preparation	Prepared for deposition of Josh Cox scheduled on 6.8.2021.	\$200.00	1.5	\$300.00
06/07/2021	JG	Deposition	Deposition of Josh Cox on 6.8.21 at McAllester and Sykes law firm.	\$200.00	4.0	\$800.00
06/08/2021	SW	Deposition	Deposition of Josh Cox	\$225.00	4.0	\$900.00
06/20/2021	JM	Deposition preparation	Prepare for Toledo deposition	\$500.00	2.3	\$1,150.00
06/21/2021	JG	Deposition	Deposition of R. Toledo	\$200.00	1.6	\$320.00
06/21/2021	JG	Case strategy discussion	strategy meeting re: deposition hearing on 6.21.21	\$200.00	0.5	\$100.00
06/21/2021	JG	Research	research re: deponent right to counsel	\$200.00	0.8	\$150.00



06/21/2021	JG	Court Attendance	court hearing on deponent Toledo obtaining counsel	\$200.00	0.3	\$60.00
06/21/2021	JM	Deposition	Begin deposition of Rodrigo Toledo, prepare for and attend court hearing re: same, including strategy session; legal research re: issues brought up by Defense counsel; prepare for second second day of Toledo deposition	\$355.00	3.6	\$1,278.00
06/28/2021	JG	Deposition	Deposition of R. Toledo on 6.28.21.	\$200.00	3.5	\$700.00
06/28/2021	JM	Deposition	Prepare for and complete deposition of Rodrigo Toledo	\$355.00	5.1	\$1,810.50
06/29/2021	MN	Document Management	discovery index	\$130.00	1.6	\$208.00
07/06/2021	MN	Document Management	Discovery Index	\$130.00	1.6	\$208.00
07/19/2021	JM	Internal Meeting	Review correspondence from Court, discuss w/ team	\$500.00	0.1	\$50.00
07/22/2021	JM	Document Review	Begin review of Daggett's 1600 page supplemental production of 7/22/2021	\$500.00	2.1	\$1,050.00
07/23/2021	JM	Document Review	Continue review of 1600 page supplemental production of 7/22/2021	\$500.00	3.7	\$1,850.00
07/27/2021	SW	Document Review	Review of Daggett County Documents	\$225.00	3.0	\$675.00
07/27/2021	JM	Document Review	Review, slightly edit, and approve Def's motion re: extension of time	\$500.00	0.4	\$200.00
07/28/2021	JM	Document Review	Complete initial review of Daggett's 1600 page supplemental production of 7/22/2021	\$500.00	2.9	\$1,450.00
07/30/2021	JM	Document Preparation	Draft Frasier retainer agreement, review Frasier CV	\$500.00	1.1	\$550.00
08/04/2021	MN	Document Management	discovery index	\$130.00	0.5	\$65.00
08/06/2021	MN	Document Management	Discovery Index	\$130.00	1.0	\$130.00
08/10/2021	SW	Document Preparation	Dimick declaration preparation	\$225.00	7.0	\$1,575.00
08/12/2021	SW	Research	Research in preparation for opposition to motion for summary judgment	\$225.00	4.0	\$900.00
08/17/2021	SW	Document Review	Review of UDC production	\$225.00	5.0	\$1,125.00
08/18/2021	SW	Document Review	Review of UDC document production	\$225.00	1.0	\$225.00
08/20/2021	JM	Document Review	Begin review of additional 800+ page disclosure by Daggett of 8/19/21	\$500.00	5.0	\$2,500.00
08/22/2021	JM	Deposition preparation	Prepare for 30b6 deposition, including review of Daggett's MSJ; complete initial review of 800+ additional production of 8/19/21	\$500.00	4.6	\$2,300.00
08/23/2021	SW	Drafting Motion	Draft outline for opposition to Daggett County Motion for Summary Judgment	\$225.00	10.0	\$2,250.00
08/23/2021	JM	Deposition	Prepare for and conduct deposition of Rule 30b6 witness	\$355.00	6.7	\$2,378.50
08/24/2021	JM	Document Review	Complete review Daggett's First MSJ and accompanying materials; conduct legal research re: same	\$500.00	4.2	\$2,100.00
08/25/2021	JM	Research	Continue legal research re: cases cited in Daggett's MSJ; conduct legal research re: available sanctions	\$500.00	4.6	\$2,300.00

08/26/2021	JM	Research	Review Daggett County sheriffs' policy manuals in connection w/ MSJ	\$500.00	2.7	\$1,350.00
09/06/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	1.2	\$240.00
09/06/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	1.1	\$220.00
09/09/2021	MN	Document Management	Discovery Index	\$130.00	2.0	\$260.00
09/11/2021	JG	Drafting Motion	Drafting Opposition Memorandum to Defendants' Motion for Summary Judgment	\$200.00	9.8	\$1,960.00
09/12/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	3.4	\$680.00
09/13/2021	MN	Document Management	Discovery Index	\$130.00	1.0	\$130.00
09/16/2021	MN	Document Management	Discovery Index	\$130.00	2.0	\$260.00
09/17/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	1.5	\$300.00
09/18/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	9.0	\$1,800.00
09/19/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	7.9	\$1,580.00
09/20/2021	MN	Document Management	Discovery Index	\$130.00	1.3	\$169.00
09/21/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
09/22/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
09/22/2021	JM	Drafting Motion	Review, edit, and draft additional fact section for Porter opp to MSJ brief; complete research and analysis re: sanctions	\$500.00	4.0	\$2,000.00
09/23/2021	JG	Document Review	Margo Frasier Expert Declaration Review.	\$200.00	0.7	\$140.00
09/23/2021	MN	Document Management	Discovery Index	\$130.00	2.5	\$325.00
09/23/2021	JM	Research	Continue legal research re: cases cited in Daggett's MSJ; start new research re: same; start drafting stipulated extension of time; review and meet re: Frasier report	\$500.00	6.0	\$3,000.00
09/24/2021	JG	Document Review	review Margo Frasier expert declaration	\$200.00	0.2	\$40.00
09/24/2021	JM	Research	Correspondence w/ cons. pl and def counsel re: extension; continue legal research for opp'n to MSJ	\$500.00	3.8	\$1,900.00
09/26/2021	JG	Drafting Motion	Drafting disputed and additional fact sections of opposition to defendant's Motion for Summary Judgment	\$200.00	1.3	\$260.00
09/27/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
09/28/2021	MN	Document Management	Discovery Index	\$130.00	1.0	\$130.00

09/29/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
09/30/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
10/01/2021	MN	Document Management	Discovery Index	\$130.00	3.0	\$390.00
10/05/2021	JG	Drafting Motion	Drafting disputed and additional fact section of opposition to defendant's Motion for Summary Judgment	\$200.00	3.3	\$660.00
10/06/2021	JG	Drafting Motion	Drafting argument sections of opposition to Defendants' Motion for Summary Judgment	\$200.00	1.6	\$320.00
10/08/2021	JG	Drafting Motion	Drafting argument sections of opposition to Defendants' Motion for Summary Judgment and researching supervisor liability.	\$200.00	4.0	\$800.00
10/09/2021	JG	Research	researched individual liability for § 1983 claims for opposition motion to defendants motion for summary judgment	\$200.00	3.0	\$600.00
10/10/2021	JG	Drafting Motion	drafting individual liability section of opposition motion to defendants motion for summary judgment	\$200.00	2.5	\$500.00
10/10/2021	JG	Drafting Motion	drafting supervisor liability/8th amendment section of opposition to defendant's motion for summary judgment	\$200.00	7.5	\$1,500.00
10/11/2021	JG	Drafting Motion	drafting supervisor liability/8th amendment/qualified immunity section of opposition to defendant's motion for summary judgment	\$200.00	0.7	\$140.00
10/11/2021	MN	Document Management	identification of exhibits for expert's report	\$130.00	1.0	\$130.00
10/11/2021	JG	Drafting Motion	Drafted sections on 8th amendment individual and municipal liability to for opposition motion to defendants motion for summary judgment	\$200.00	8.1	\$1,620.00
10/11/2021	JM	Document Review	Review document production by Daggett and DOC; review all sections of draft opp to MSJ	\$500.00	6.3	\$3,150.00
10/12/2021	JG	Drafting Motion	Drafted sections on 8th amendment individual and municipal liability to for opposition motion to defendants motion for summary judgment	\$200.00	2.0	\$400.00
10/13/2021	MN	Document Review	DRAFT Appendix of Evidence, fact check SJ doc	\$130.00	7.0	\$910.00
10/13/2021	JG	Drafting Motion	Drafted and edited state claim section of opposition to defendant's motion for summary judgment	\$200.00	2.1	\$420.00
10/14/2021	JG	Drafting Motion	Drafted facts section adding in declarations and plaintiffs deposition statements for opposition to defendant's motion for summary judgment	\$200.00	3.4	\$680.00
10/14/2021	MN	Document Review	Drafting & editing Appendix of Evidence, fact checking SJ document	\$130.00	8.9	\$1,157.00
10/14/2021	JM	Drafting Motion	Review Fact and Law Sections of Draft Opp to SJ	\$355.00	3.4	\$1,207.00
10/14/2021	JM	Drafting Motion	Edit Draft Motion for Overlength Brief	\$355.00	0.7	\$248.50
10/15/2021	JM	Drafting Motion	Drafted motion to file under opp to SJ seal	\$355.00	0.4	\$142.00
10/15/2021	MN	Document Review	fact check SJ document	\$130.00	1.6	\$208.00
10/21/2021	JM	Correspondance	Conduct analysis and correspond w/ counsel for Olsen re: sanctions in relation to SJ motion	\$500.00	1.2	\$600.00
11/11/2021	JM	Correspondance	Correspondence w/ opp counsel re: extension for reply	\$500.00	0.2	\$100.00
11/29/2021	JM	Document Review	Review Def's reply ISO MSJ; legal research re: same	\$500.00	3.6	\$1,800.00

12/03/2021	MP	Communication with Client	Mailed SD and DP OC's Reply and letter. Emailed JA OC's Reply and letter.	\$110.00	0.3	\$33.00
01/03/2022	MP	Communication with Client	Emailed Amanda and Joshua re no movement on MSJ briefings.	\$110.00	0.2	\$22.00
01/04/2022	MP	Communication with Client	Mailed Steven Drolette and Dustin Porter brief letters explaining no updates on MSJ and that hearing will hopefully be scheduled soon.	\$110.00	0.2	\$22.00
01/05/2022	JG	Document Preparation	Reviewing co-Plaintiff's Rule 11 motion	\$200.00	0.4	\$80.00
01/05/2022	JM	Document Review	Review draft motion for sanctions in relation to MSJ	\$500.00	0.8	\$400.00
01/07/2022	JM	Drafting Motion	Edit draft motion for sanctions in relations to MSJ	\$500.00	2.9	\$1,450.00
02/15/2022	MP	Correspondance	Call w/ Clerk Ezekial Peterson @ Judge Barlow's chambers	\$110.00	0.1	\$11.00
02/16/2022	JM	Document Review	Review sealed order on SJ and otsc re: sealing	\$500.00	2.5	\$1,250.00
02/23/2022	MP	Communication with Client	Phone Call w/ Josh Asay 2.23.22 re MH treatment locations.	\$110.00	0.2	\$22.00
02/23/2022	JM	Drafting Motion	Draft response to OTSC re: sealing; file same; correspondence w/ counsel re: expert discovery extension	\$500.00	0.6	\$300.00
02/24/2022	MP	Document Preparation	Drafted Stip Motion to Extend Discovery Deadlines and proposed Order. Sent to JM to review.	\$110.00	0.5	\$55.00
02/24/2022	MP	Document Management	Saved pldgs 163 and 164 to case file.	\$110.00	0.1	\$11.00
02/24/2022	MP	Research	Joshua Asay MH records requests: Research on hospitals request forms, calls to hospitals to confirm requirements. Filled out request forms. Drafted HIPAA waiver. Emailed JM to review.	\$110.00	2.0	\$220.00
02/24/2022	JM	Document Review	Review unsealed order on SJ	\$500.00	0.5	\$250.00
02/25/2022	MP	Deposition preparation	Drafted Motion for Leave to file Amended Opp to SJ due to victim's real name being used in original filing. Sent to JM/JG for review.	\$110.00	0.6	\$66.00
02/25/2022	MP	Communication with Client	Call to Josh to get list of providers since he turned 18. Calls to additional providers re records requests.	\$110.00	0.3	\$33.00
02/25/2022	JM	Drafting Motion	Draft motion to extend expert deadlines; correspondence w/ counsel re: same	\$500.00	0.3	\$150.00
03/01/2022	MP	Research	Sent health records requests for Joshua Asay's mental health history.	\$110.00	2.5	\$275.00
03/01/2022	MP	Document Preparation	Created exhibits for Motion for Leave to Amend Opp to SJ to redact Jane Doe's real name for pleading. Made edits to Motion for Leave to Amend Opp. Drafted Motion for Leave to File Under Seal and accompanying proposed Order. Sent to JG for review.	\$110.00	1.5	\$165.00
03/02/2022	MP	Research	Received Asay MH Records via fax from Exodus. Scanned and saved to file.	\$110.00	0.1	\$11.00
03/02/2022	MP	Document Management	Saved filings to case folder. Served parties with sealed Motion via email. Emailed Judge proposed orders. Mailed Toledo and Cox all pleadings that were filed today.	\$110.00	1.0	\$110.00
03/03/2022	JM	Drafting Motion	Complete and file motion to extend	\$500.00	0.2	\$100.00
03/08/2022	MP	Document Management	Saved Orders 170 & 171 to file. Updated cals and set reminders.	\$110.00	0.4	\$44.00

03/09/2022	MP	Research	Followed up on mental health records requests for Asay via phone and email.	\$110.00	0.8	\$88.00
03/11/2022	MP	Expert Witness Preparation	Call w/ Dr. Kantorova	\$110.00	1.0	\$110.00
03/11/2022	JM	Document Review	Review Dr. Kantorova CV; conduct interview w/ Dr. Kantorova	\$500.00	1.4	\$700.00
03/14/2022	MP	Administrative	Coordination of client's medical evaluations w/ Dr. Hobfoll and Dr. Kantorova.	\$110.00	3.0	\$330.00
03/17/2022	MP	Case strategy discussion	Meeting w/ Co-Counsel 3.17.22 re Rule 11 and 37 motions and Order on SJ	\$110.00	1.0	\$110.00
03/17/2022	MP	Document Preparation	Drafted Identification of Expert Witnesses for Margo Frasier. Sent to JM and JG.	\$110.00	0.3	\$33.00
03/18/2022	MP	Document Review	Reviewed Joshua Asay's mental health records, made summaries.	\$110.00	5.3	\$583.00
03/21/2022	JM	Document Preparation	Revise draft agreement w/ Kantarova	\$500.00	0.4	\$200.00
03/22/2022	MP	Expert Witness Preparation	Call w/ Dr. Hobfoll	\$110.00	1.0	\$110.00
03/22/2022	JM	Document Review	Review Dr. Hobfoll CV; conduct interview w/ Dr. Hobfoll	\$500.00	1.5	\$750.00
03/23/2022	MP	Communication with Client	Left VM and sent email to Joshua Asay re expert witness dates.	\$110.00	0.2	\$22.00
03/24/2022	MP	Communication with Client	Call w/ Steven Drollette	\$110.00	0.6	\$66.00
04/01/2022	MP	Case strategy discussion	Meeting w/ Co-Counsel 4.1.22	\$110.00	0.5	\$55.00
04/04/2022	MP	Administrative	Medical records requests. Call w/ client Joshua Asay.	\$110.00	2.0	\$220.00
04/06/2022	JM	Document Review	Review Hobfoll report	\$500.00	2.3	\$1,150.00
04/11/2022	JM	Research	Continue legal research re: Rule 11 sanctions; begin drafting motion/memo re: same	\$500.00	2.5	\$1,250.00
04/12/2022	JM	Research	Continue legal research re: Rule 11 sanctions; continue drafting motion/memo re: same	\$500.00	1.9	\$950.00
04/13/2022	JM	Research	Continue legal research re: Rule 11 sanctions; continue drafting motion/memo re: same	\$500.00	1.7	\$850.00
04/26/2022	MP	Communication with Client	Call w/ Steven Drollette 4.26.22	\$110.00	0.2	\$22.00
04/27/2022	MP	Communication with Client	MP Call from Josh Asay 4.27.22	\$110.00	0.5	\$55.00
05/09/2022	JM	Document Review	Review draft of Kantorova report	\$500.00	2.6	\$1,300.00
05/10/2022	MP	Document Preparation	Call with expert witness Dr. Stevan Hobfoll to review first draft of reports on Porter and Drollette.	\$110.00	0.5	\$55.00
05/11/2022	MP	Document Review	Call with Dr. Daniela Kantorova after first review of report (5/11/22)	\$110.00	0.6	\$66.00
05/11/2022	JM	Document Review	Complete review of Kantorova report; meet w/ Kantorova re: same	\$500.00	1.7	\$850.00
05/17/2022	JM	Document Review	Review expert disclosure filing and notice to opposing counsel	\$500.00	0.5	\$250.00
05/20/2022	JM	Correspondance	Correspondence w/ counsel: re Rule 11 sanctions safe harbor notice	\$500.00	0.5	\$250.00
06/16/2022	JM	Drafting Motion	Assist in finalizing motion for Rule 11 sanctions	\$500.00	0.3	\$150.00

07/08/2022	JM	Document Review	Review opp'n to motion for Rule 11 sanctions and motion to seal	\$500.00	1.8	\$900.00
07/20/2022	JG	Drafting Motion	research/drafting Rule 11 reply	\$200.00	8.2	\$1,640.00
07/21/2022	JM	Drafting Motion	Assist w/ draft reply ISO Rule 11 sanctions; legal research re: same	\$500.00	2.7	\$1,350.00
07/22/2022	JG	Drafting Motion	drafting/researching R11 reply to opposition	\$200.00	2.2	\$440.00
07/22/2022	JM	Drafting Motion	Assist w/ finalizing draft reply ISO Rule 11	\$500.00	1.2	\$600.00
08/03/2022	MP	Correspondance	Mailed letter to Toledo 8/2/22	\$110.00	0.2	\$22.00
08/15/2022	JM	Document Review	Review expert disclosure by Daggett; begin review of expert report	\$500.00	2.3	\$1,150.00
08/16/2022	MP	Communication with Client	Call with Josh re GRAMA release and status of litigation.	\$110.00	0.4	\$44.00
08/17/2022	MP	Communication with Client	Prepared letters/emails to Drollette, Asay, and Porter re: R11 Opposition, Reply, and Ds' Expert Report. Mailed to Drollette and emailed to Asay and Porter.	\$110.00	0.4	\$44.00
08/18/2022	JM	Document Review	Complete review of Daggett expert report; conduct legal research re: same	\$500.00	3.1	\$1,550.00
09/06/2022	MP	Document Review	Reviewed past requests for extensions, drafted outline.	\$110.00	1.0	\$110.00
09/14/2022	MP	Correspondance	Call to OC re: stipulating to Motion to Extend Discovery Deadlines.	\$110.00	0.1	\$11.00
09/15/2022	JM	Drafting Motion	Assist in drafting motion re: expert discovery deadlines	\$500.00	0.7	\$350.00
09/22/2022	JM	Drafting Motion	Draft and file motion to respond re: expert discovery deadlines; review Daggett opp'n brief re expert deadlines	\$500.00	0.5	\$250.00
09/26/2022	JM	Drafting Motion	Draft and file reply re: expert discovery deadlines	\$500.00	2.1	\$1,050.00
09/28/2022	JM	Document Review	Review Court order on expert discovery deadlines	\$500.00	0.3	\$150.00
10/11/2022	MP	Deposition preparation	Met with Dr. Hobfoll to prepare for deposition.	\$110.00	2.0	\$220.00
10/13/2022	MP	Case strategy discussion	Team meeting to discuss trial strategy and preparation for upcoming depositions.	\$110.00	1.0	\$110.00
10/13/2022	MP	Document Management	Reviewed discovery, compiled discovery spreadsheet.	\$110.00	1.4	\$154.00
10/13/2022	JM	Internal Meeting	Met w/ team to discuss expert depositions	\$500.00	1.0	\$500.00
10/14/2022	MP	Correspondance	Calendared rescheduled deposition for Kantorova and Hobfoll. Emailed expert witnesses to inform them of scheduling and to set up prep time with Kantorova.	\$110.00	0.5	\$55.00
10/21/2022	MP	Communication with Client	Call w/ Josh re case updates, his crim case, and records request for March incident.	\$110.00	0.3	\$33.00
10/24/2022	JM	Deposition preparation	Assist J. Groth w/ Stewart Depo prep	\$500.00	1.3	\$650.00
10/25/2022	JM	Deposition	Attend Stewart depo (taken by J. Groth), debrief w/ team	\$500.00	2.9	\$1,450.00
11/01/2022	JG	Expert Witness Preparation	Expert witness prep for deposition and discovery disclosures with Dr. Kantrova.	\$200.00	0.3	\$60.00
11/01/2022	VD	Deposition preparation	Check in w/ Hobfoll regarding deposition	\$200.00	0.2	\$40.00
11/01/2022	VD	Correspondance	Phone call with Andrew related to deposition logistics	\$200.00	0.1	\$20.00



11/03/2022	VD	Deposition preparation	Prep for Hobfoll deposition; review porter and Drollette evaluations and notes	\$200.00	2.1	\$420.00
11/03/2022	JM	Deposition preparation	Met w/ Hobfoll to prep for deposition	\$500.00	2.1	\$1,050.00
11/04/2022	JG	Deposition	Defend Hobfoll Deposition	\$200.00	1.9	\$380.00
11/04/2022	VD	Deposition	Defend Hobfoll deposition	\$200.00	1.9	\$380.00
11/04/2022	JM	Deposition	Attend Hobfoll deposition	\$500.00	1.9	\$950.00
11/10/2022	JG	Expert Witness Preparation	Discussed and prepared expert Daniela Kantorova for her deposition on Nov. 17, 2022.	\$200.00	2.0	\$400.00
11/17/2022	MP	Deposition	Daniela Kantorova deposition	\$110.00	0.5	\$55.00
11/17/2022	JG	Deposition	Deposition of Daniela Kantorova.	\$200.00	0.5	\$100.00
11/17/2022	JG	Drafting Motion	Draft motion to expedite scheduling conference.	\$200.00	0.2	\$40.00
11/17/2022	MP	Document Management	Compiling discovery spreadsheet.	\$110.00	1.8	\$192.50
11/17/2022	MP	Document Preparation	Drafted proposed order for mtn to expedite scheduling conf. Reviewed mtn for edits. Filed and emailed to judge.	\$110.00	0.6	\$66.00
11/17/2022	JM	Drafting Motion	Prepare and file motion to expedite scheduling conference	\$500.00	0.6	\$300.00
11/21/2022	MP	Document Management	Downloaded pldgs 195 and 196, saved to Sharepoint and MyCase.	\$110.00	0.2	\$22.00
11/22/2022	MP	Document Management	Compiling discovery spreadsheet.	\$110.00	1.0	\$110.00
11/28/2022	MP	Document Management	Downloaded Hobfoll depo transcript. Emailed Hobfoll copy to review. Calendared deadline to return to Garcia McCall.	\$110.00	0.3	\$33.00
11/29/2022	MP	Document Management	Filed court orders. Calendared deadlines. Drafted and sent client communications. Filed invoices and sent check reqs to HW. Updated expenses on MC.	\$110.00	1.2	\$132.00
12/07/2022	MP	Document Management	Saved Kantorova deposition transcript to files. Emailed to witness for corrections. Calendared deadline to return to court reporter. Submitted check request to HW for invoice from Garica McCall. Filed expense.	\$110.00	0.3	\$33.00
12/08/2022	MP	Document Management	Compiling discovery index.	\$110.00	0.7	\$77.00
12/13/2022	MP	Correspondance	Call with Dr. Kantorova re deposition corrections. Call with JM and JG to debrief.	\$110.00	0.4	\$44.00
12/16/2022	JM	Drafting Motion	Prepare joint trial brief; correspondence w/ counsel re: same	\$500.00	2.7	\$1,350.00
12/20/2022	JM	External Meeting	Meet and confer re: joint trial brief; finalize and file same; correspondence w/ Daggett re: motion for extension review and suggest edits to same	\$500.00	1.9	\$950.00
12/30/2022	JM	Document Review	Review order denying Rule 11 sanctions; begin legal research re: same; review OTSC re: sealing and 1927 sanctions	\$500.00	0.8	\$400.00
01/04/2023	JM	Court Attendance	Prepare for and attend scheduling conference	\$500.00	0.7	\$350.00
01/05/2023	JM	Drafting Motion	Begin drafting response to OTSC re: 1927 sanctions; legal research re: same	\$500.00	3.1	\$1,550.00
01/06/2023	JM	Drafting Motion	Draft response to OTSC re: sealing sanctions order; continue response to OTSC for 1927 sanctions	\$500.00	2.5	\$1,250.00
01/11/2023	MP	Document Review	Review of response to OTSC on sanctions for edits.	\$110.00	1.3	\$143.00



01/11/2023	MP	Document Review	Review response to OSTC on unsealing order for edits.	\$110.00	0.4	\$44.00
01/11/2023	MP	Document Management	Compiling binders for trial prep.	\$110.00	0.6	\$66.00
01/12/2023	JM	Research	Continue research and writing re: response to OTSC for 1927 sanctions	\$500.00	2.3	\$1,150.00
01/13/2023	JM	Drafting Motion	Finalize and file responses to OTSC on 1927 and sealing	\$500.00	1.9	\$950.00
01/17/2023	MP	Document Management	Downloaded and filed pleadings.	\$110.00	0.2	\$22.00
01/17/2023	MP	Document Management	Compiling virtual binders in preparation of trial.	\$110.00	1.0	\$110.00
01/18/2023	MP	Document Preparation	Compiling physical deposition binders.	\$110.00	2.0	\$220.00
01/23/2023	MP	Document Preparation	Research on rules re: notices of errata. Call to clerk's office re: errata. Drafted notice of errata.	\$110.00	0.8	\$88.00
01/23/2023	JM	Document Preparation	Prepare and file errata	\$500.00	0.4	\$200.00
01/27/2023	MP	Communication with Client	Texts to Joshua and Dustin re: settlement discussion dates. Call to Steven re: settlement discussion dates. Communication with attnys re questions clients had.	\$110.00	0.6	\$66.00
01/27/2023	JM	Document Review	Review and conduct legal research re: Daggett's response to OTSC on 1927 sanctions	\$500.00	2.1	\$1,050.00
01/30/2023	MP	Case strategy discussion	Call w/ adjacent counsel re: strategy on Ds response to response to OTSC.	\$110.00	0.4	\$44.00
01/30/2023	VD	Case strategy discussion	Discussion related to strategy related to response to reply	\$200.00	0.8	\$160.00
01/30/2023	JM	Case strategy discussion	Attend strategy session re: possible response to OTSC response	\$500.00	0.8	\$400.00
02/01/2023	MP	Research	Researching rules on subpoenas for trial.	\$110.00	0.4	\$44.00
02/02/2023	MP	Document Management	Retrieved, scanned, and briefly reviewed Asay's settlement agreements in response to OC's email.	\$110.00	0.3	\$33.00
02/15/2023	MP	Correspondance	Left VM and email with Lt. Shaver at Iron Co Jail re: Drollette attending settlement conference.	\$110.00	0.2	\$22.00
02/22/2023	MP	Correspondance	Attended meet and confer with adjacent-counsel and defendants re: settlement conference.	\$110.00	0.8	\$88.00
02/22/2023	MP	Case strategy discussion	Call w/ JM & VDF re meet and confer and next steps.	\$110.00	0.9	\$99.00
02/22/2023	MP	Correspondance	Left VM with Matt Willey, clerk of Judge Magistrate Pead, to confirm it's ok I send Zoom link to Iron Co Jail for Steven.	\$110.00	0.1	\$11.00
02/22/2023	JM	External Meeting	Prepare for and attend meet and confer on settlement; begin draft statement re: same	\$500.00	1.7	\$850.00
02/23/2023	MP	Document Review	Reviewing joint confidential statement of Ps.	\$110.00	2.1	\$231.00
02/23/2023	JM	Document Preparation	Draft confidential mediation statement	\$500.00	2.4	\$1,200.00
02/24/2023	MP	Document Review	Reviewing and filing mediation statements (confidential and joint). Emails with adjacent counsel and opposing counsel.	\$110.00	2.5	\$275.00

02/24/2023	JM	Document Preparation	Finalize joint and Plaintiff mediation statements; transmit to Judge Pead	\$500.00	0.8	\$400.00
02/28/2023	MP	Communication with Client	Call w/ Steven re: settlement conf and BOPP hearing update	\$110.00	0.1	\$11.00
03/02/2023	MP	Communication with Client	Sent text and email to Josh to notify him settlement conf was postponed. Requested he call us back.	\$110.00	0.2	\$22.00
03/03/2023	MP	Document Management	Creating binders of UDC produced discovery.	\$110.00	1.6	\$176.00
03/07/2023	MP	Case strategy discussion	Meeting with JM and VDF to discuss trial prep.	\$110.00	1.3	\$143.00
03/07/2023	MP	Communication with Client	Call with Drollette re: postponement of settlement conference. Email to jail to update them about the conf being postponed.	\$110.00	0.2	\$22.00
03/07/2023	MP	Communication with Client	Call with Joshua Asay re: settlement conference and the June 2022 American Fork records. See case note for more details.	\$110.00	0.3	\$33.00
03/07/2023	JM	Case strategy discussion	Meet w/ VDF and MP re: case strategy	\$400.00	1.3	\$520.00
03/10/2023	JM	Correspondance	Correspondence w/ counsel re: joint statement; update statement	\$500.00	0.4	\$200.00
03/14/2023	MP	Document Management	Created Daggett Co. discovery binders.	\$110.00	2.1	\$231.00
03/14/2023	MP	Communication with Client	MP Call w/ Steven Drollette	\$110.00	0.2	\$22.00
03/22/2023	VD	Research	Research and Doc review related to Protective Order re Medical Disclosure	\$0.00	1.2	\$0.00
03/22/2023	VD	Court Attendance	Pre-Mediation Conference	\$0.00	1.1	\$0.00
03/22/2023	JM	Internal Meeting	Prepare for and attend pre-mediation session; debrief w/ team afterwards; communications to clients re: same	\$500.00	1.1	\$550.00
03/24/2023	MP	Case strategy discussion	Meeting with adjacent-counsel re: mediation conference. Debrief w/ JM and VDF to discuss plan to speak with clients.	\$110.00	1.2	\$132.00
03/24/2023	MP	Communication with Client	Attended calls w/ JM and clients to discuss mediation prospects. Updated notes.	\$110.00	1.5	\$165.00
03/24/2023	MP	Research	Recoverable trial costs research.	\$110.00	0.7	\$77.00
03/24/2023	JM	Communication with Client	Calls to each client to discuss mediation process and prospects	\$500.00	1.3	\$650.00
03/29/2023	MP	Communication with Client	Call with Steven (Confirmation of Mediation Discussion)	\$110.00	0.2	\$22.00
03/29/2023	VD	Case strategy discussion	discussion w/ Daniel oswald re mediation and email drafting	\$0.00	0.3	\$0.00
03/29/2023	VD	Correspondance	Drafted and edited correspondence to chambers re mediation	\$0.00	0.4	\$0.00
03/29/2023	VD	Communication with Client	spoke with Dustin re mediation	\$0.00	0.2	\$0.00
03/29/2023	JM	Correspondance	Discussions and correspondence w/ counsel and clients re: settlement	\$500.00	0.5	\$250.00
04/03/2023	MP	Communication with Client	Call with Josh. Case noted conversation.	\$110.00	0.7	\$77.00
04/03/2023	MP	Case strategy discussion	Internal team meeting re: next steps	\$110.00	0.5	\$55.00

04/04/2023	MP	Document Management	Download re-produced discovery from UDC. Organize files and upload to Sharepoint. Email to UDC requesting UDC-ASAY 9713-9718.	\$110.00	0.4	\$44.00
04/04/2023	MP	Research	Reviewed and uploaded Rule 54 (recoverable costs) research to Sharepoint.	\$110.00	0.2	\$22.00
04/04/2023	VD	Case strategy discussion	VDF/MP Conversation re Josh Asay	\$0.00	0.3	\$0.00
04/05/2023	MP	Document Review	Read Olsen's deposition transcript. Updated case timeline spreadsheet with details. Began reviewing Holly Dick's deposition transcript.	\$110.00	1.7	\$187.00
04/06/2023	MP	Document Review	Finished reviewing Holly Dick's deposition, updated timeline spreadsheet and created summary of depo.	\$110.00	1.4	\$154.00
04/06/2023	MP	Document Review	Reviewing Dupaix's deposition transcript.	\$110.00	0.4	\$44.00
04/11/2023	MP	Communication with Client	Call w/ Steven re: BOPP mental health report and case updates	\$110.00	0.2	\$22.00
04/13/2023	JM	Research	Legal research regarding joint and several liability in 1983 cases	\$500.00	1.1	\$550.00
04/14/2023	JM	Research	Continue legal research on liability; conduct research re: offset	\$500.00	0.5	\$250.00
05/04/2023	MP	Document Review	Reviewing UDC report.	\$110.00	1.2	\$132.00
05/24/2023	JM	Internal Meeting	Prepare for and meet w/ legal team and counsel for Olsen re: trial prep	\$500.00	1.6	\$800.00
06/22/2023	AC	Case strategy discussion	trial team meet to discuss MILs and next two months schedule	\$250.00	1.0	\$250.00
06/22/2023	JM	Internal Meeting	Trial team meet to discuss MILs and case scheduling	\$500.00	1.0	\$500.00
06/23/2023	AC	Document Review	Case review: read complaint, SJ opinion, scheduling orders	\$250.00	2.0	\$500.00
06/23/2023	JM	Document Review	Review amendment trial order from Court in detail	\$500.00	0.7	\$350.00
06/27/2023	AC	Case strategy discussion	Discussed trial assignments, motions in limine, witness prep, trial strategy	\$250.00	2.5	\$625.00
06/27/2023	JM	Internal Meeting	Trial team meeting to discuss witness prep, trial assignments; MILs, etc.	\$500.00	2.5	\$1,250.00
06/28/2023	AC	Document Review	Reviewed revised trial order, judicial preferences, joint trial notice template, mediation statement, SJ briefs	\$250.00	3.2	\$800.00
06/28/2023	AC	Draft correspondence	Review letter to clients regarding trial preparation	\$250.00	0.2	\$50.00
06/29/2023	AC	Case strategy discussion	Meet w/ co-counsel re: new order, changed dates, MiL	\$250.00	0.7	\$175.00
06/29/2023	JM	External Meeting	Meet w/ Olsen counsel and team re: amended order and trial prep	\$500.00	0.7	\$350.00
06/30/2023	JM	Document Review	Review second revised amended trial order; begin to review Daggett's second MJ	\$500.00	2.2	\$1,100.00
07/05/2023	AC	Drafting Motion	Drafting and proofreading motion for extension of time	\$250.00	3.1	\$775.00
07/05/2023	AC	Document Review	Review Def Second Motion for SJ and supporting exhibits	\$250.00	0.6	\$150.00
07/06/2023	VD	Case strategy discussion	Case strategy discussion opp SJ	\$350.00	0.5	\$175.00
07/07/2023	AC	Drafting Motion	Draft stipulation for extension of time and proposed order. Proof and circulate	\$250.00	1.7	\$425.00

07/07/2023	AC	Document Review	review/proof letter to client with new info re: 2nd SJ motion	\$250.00	0.2	\$50.00
07/07/2023	AC	Document Review	Review PHV and add licenses etc.	\$250.00	0.6	\$150.00
07/11/2023	AC	Research	Research for procedural opposition to 2nd Motion for SJ	\$250.00	2.2	\$550.00
07/12/2023	VD	Case strategy discussion	Case strategizing	\$350.00	1.0	\$350.00
07/13/2023	AC	Drafting Motion	Research and drafting procedural deficiencies argument in response to 2nd SJ	\$250.00	6.6	\$1,650.00
07/17/2023	AC	Drafting Motion	Drafting and revising response to 2nd SJ motion	\$250.00	3.5	\$875.00
07/18/2023	AC	Drafting Motion	review feedback and edits	\$250.00	1.6	\$400.00
07/19/2023	AC	Document Review	review depositions to prepare for drafting directs	\$250.00	4.0	\$1,000.00
07/20/2023	AC	Drafting Motion	Drafting and revising 2nd draft response to 2nd SJ motion	\$250.00	3.2	\$800.00
07/20/2023	AC	Document Review	review and feedback on Asay and Porter draft directs	\$250.00	3.5	\$875.00
07/20/2023	AC	Research	research excluding Jorgensen from courtroom motion in limine	\$250.00	1.8	\$450.00
07/20/2023	VD	Drafting Motion	Edits/drafting Stewart MIL	\$350.00	4.1	\$1,435.00
07/21/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	1.1	\$385.00
07/23/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	2.0	\$700.00
07/25/2023	AC	Drafting Motion	drafting procedural opposition to 2nd Motion for SJ	\$250.00	4.2	\$1,050.00
07/25/2023	AC	Drafting Motion	Research and drafting motion in limine to sequester Sheriff Jorgensen under Rule 615	\$250.00	3.5	\$875.00
07/26/2023	MP	Document Review	Reviewing Olsen's depo for "consent" MIL	\$110.00	0.3	\$33.00
07/26/2023	MP	Communication with Client	Left VM for Josh at 801-623-2603.	\$110.00	0.1	\$11.00
07/26/2023	MP	Communication with Client	Call with Josh re: 2nd MSJ.	\$110.00	0.2	\$22.00
07/26/2023	AC	Drafting Motion	Research and drafting Motion in Limine re: excluding Jogensen under R. 615	\$250.00	3.0	\$750.00
07/26/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	1.3	\$455.00
07/27/2023	AC	Drafting Motion	Drafting Motion in Limine re: excluding Jogensen under R. 615	\$250.00	2.3	\$575.00
07/27/2023	AC	Drafting Motion	Drafting and proofreading procedural response to 2nd motion for SJ	\$250.00	2.1	\$525.00
07/27/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	4.3	\$1,505.00
07/28/2023	MP	Document Review	Reviewing Defs MSJ and Reply for "consent" MIL research to see if defs raised similar argument.	\$110.00	0.6	\$66.00
07/28/2023	MP	Document Review	Edits to Jorgensen sequestration MIL	\$110.00	0.8	\$88.00
07/29/2023	MP	Drafting Motion	Drafting opp SJ	\$110.00	5.7	\$627.00
07/30/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	5.5	\$1,925.00
07/31/2023	MP	Case strategy discussion	Call with Olsen team re: MILs and Opp to 2nd MSJ.	\$110.00	0.7	\$77.00
07/31/2023	MP	Document Management	Pulling complaints + dockets of all consolidated cases for research into medical neglect claim.	\$110.00	0.3	\$33.00
07/31/2023	MP	Document Review	Review of MIL exp witness Stewart.	\$110.00	2.2	\$242.00
07/31/2023	VD	Case strategy discussion	Case strategy discussion	\$350.00	1.0	\$350.00

07/31/2023	VD	Drafting Motion	Drafting opp to SJ	\$350.00	6.4	\$2,240.00
08/01/2023	AC	Case strategy discussion	meet w/ VD re: motions in limine	\$250.00	0.4	\$100.00
08/01/2023	MP	Drafting Motion	Drafting opp SJ	\$110.00	3.2	\$352.00
08/02/2023	MP	Research	Reviewing record for mention of Asay's medical neglect claim	\$110.00	0.9	\$99.00
08/02/2023	AC	Drafting Motion	Reviewed 7 edited stewart expert report MiL	\$250.00	2.3	\$575.00
08/02/2023	AC	Administrative	review court order postponing trial order dates	\$250.00	0.2	\$50.00
08/06/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	5.0	\$1,750.00
08/07/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	5.5	\$1,925.00
08/08/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	4.3	\$1,505.00
08/09/2023	AC	Research	research for substantive response to 2nd motion for SJ. Rule 410, discretion, and similar Monell situations	\$250.00	2.4	\$600.00
08/09/2023	AC	Drafting Motion	reviewing and proofing opposition to 2nd motion for SJ	\$250.00	2.7	\$675.00
08/09/2023	AC	Drafting Motion	reviewing, checking cites, and proofing opposition to 2nd motion for SJ	\$250.00	4.0	\$1,000.00
08/09/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	6.4	\$2,240.00
08/09/2023	JM	Document Review	Complete review of Daggett's second MSJ; legal research re: same; review draft opp'n to second MSJ; begin to revise and edit same	\$500.00	5.9	\$2,950.00
08/10/2023	MP	Document Review	Reviewing + editing opp to Defs 2nd MSJ.	\$110.00	3.5	\$385.00
08/10/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	5.6	\$1,960.00
08/10/2023	JM	Research	Complete legal research and review and revision of draft opp'n to second MSJ	\$500.00	6.2	\$3,100.00
08/11/2023	VD	Drafting Motion	Drafting opp SJ	\$350.00	5.0	\$1,750.00
08/14/2023	AC	Communication with Client	reviewed email to clients with updates re: 2nd SJ motion and postponed pre-trial dates	\$250.00	0.2	\$50.00
08/17/2023	AC	Communication with Client	internal discussion on whether to notify Josh with updates (found out he was in patient care) - ethics hotline and discussion	\$250.00	0.4	\$100.00
08/18/2023	AC	Communication with Client	internal discussion re: communication with josh while he is hospitalized - see note for decision	\$250.00	0.3	\$75.00
08/30/2023	AC	Drafting Motion	finalized motions in limine to share with olsen team	\$250.00	2.2	\$550.00
09/05/2023	MP	Document Preparation	Filed redacted exs per dckt. 242	\$110.00	0.3	\$33.00
09/06/2023	AC	Drafting Motion	research standard and drafting motion for leave to file sur-reply	\$250.00	2.2	\$550.00
09/06/2023	AC	Document Review	review def. reply br. to 2nd SJ	\$250.00	1.0	\$250.00
09/06/2023	JM	Document Review	Review Daggett's reply ISO 2nd MSJ; legal research re: same; begin drafting reply re: same	\$500.00	4.2	\$2,100.00
09/07/2023	JM	Research	Continue legal research and drafting of proposed surreply	\$500.00	2.9	\$1,450.00
09/08/2023	AC	Drafting Motion	review and edit sur-reply	\$250.00	1.6	\$400.00
09/08/2023	AC	Drafting Motion	drafting motion to reinstate trial deadlines	\$250.00	1.7	\$425.00
09/08/2023	AC	Internal Meeting	meeting w/ Olsen team	\$250.00	0.4	\$100.00
09/08/2023	JM	Drafting Motion	Complete draft proposed surreply and motion to file same; internal meeting re: trial prep w/ Olsen team	\$500.00	4.0	\$2,000.00

09/13/2023	JM	Document Review	Review order denying second MSJ; review communication w/ opp'n counsel re: extension of trial date	\$500.00	1.9	\$950.00
09/14/2023	JM	Correspondance	Comms w/ opp counsel re: extension of trial; review motion re: same	\$500.00	0.8	\$400.00
09/17/2023	JM	Research	Legal research and drafting oppn to trial date extension	\$500.00	2.6	\$1,300.00
09/18/2023	AC	Administrative	review Def's motion to continue trial	\$250.00	0.3	\$75.00
09/18/2023	JM	Research	Complete legal research and draft of oppn to trial date extension	\$500.00	1.5	\$750.00
09/19/2023	AC	Document Preparation	Draft Joint Trial Notice Facts	\$250.00	2.0	\$500.00
09/20/2023	AC	Court Attendance	hearing on Def motion to continue trial	\$250.00	1.1	\$275.00
09/20/2023	AC	Case strategy discussion	meeting with co-counsel before hearing on motion to continue trial	\$250.00	0.2	\$50.00
09/20/2023	MP	Hearing Preparation	Attended hearing on motion to continue. Team debrief afterwards.	\$110.00	1.0	\$110.00
09/20/2023	JM	Hearing Preparation	Prepare for and attend hearing re: trial extension	\$500.00	1.5	\$750.00
09/21/2023	AC	Administrative	discussions regarding new proposed trial dates, contacting expert witnesses, conferring with co-counsel and opposing counsel	\$250.00	0.6	\$150.00
09/25/2023	JM	Document Review	Review and approve stip motion for extension	\$500.00	0.2	\$100.00
09/28/2023	AC	Document Preparation	Draft Joint Trial Notice facts	\$250.00	1.6	\$400.00
10/03/2023	AC	Document Preparation	draft joint trial notice - witnesses	\$250.00	2.4	\$600.00
10/05/2023	AC	Document Preparation	Joint trial notice - facts and law	\$250.00	1.3	\$325.00
10/05/2023	AC	Document Preparation	Joint trial notice - legal issues	\$250.00	2.0	\$500.00
10/06/2023	AC	Document Preparation	Joint trial notice - facts and law	\$250.00	2.2	\$550.00
10/10/2023	MP	Communication with Client	Call w/ Steven Drollette	\$110.00	0.2	\$22.00
10/17/2023	JM	Document Review	Review and approve stip motion for extension	\$500.00	0.2	\$100.00
11/20/2023	AC	Research	Research Motion in Limine regarding final policymakers	\$250.00	2.2	\$550.00
11/20/2023	AC	Drafting Motion	Drafting and editing Motion in Limine regarding final policymakers	\$250.00	6.2	\$1,550.00
11/22/2023	AC	Research	Research Motion in Limine regarding final policymakers	\$250.00	0.8	\$200.00
11/23/2023	AC	Drafting Motion	Drafting Motion in Limine regarding final policymakers	\$250.00	2.0	\$500.00
11/24/2023	AC	Drafting Motion	Drafting and editing Motion in Limine regarding final policymakers	\$250.00	0.7	\$175.00
11/27/2023	JM	Research	Legal research and drafting of MIL to exclude D's expert	\$500.00	3.2	\$1,600.00
11/28/2023	JM	Research	Continue research and drafting of MIL to exclude D's expert	\$500.00	4.0	\$2,000.00
11/29/2023	AC	Research	research for Motion in Limine regarding the admissibility of Jorgensen's plea	\$250.00	1.6	\$400.00



11/29/2023	AC	Drafting Motion	Drafted Motion in Limine regarding the admissibility of Jorgensen's plea	\$250.00	3.5	\$875.00
12/01/2023	JM	Research	Continue research and drafting of MIL to exclude D's expert	\$500.00	1.8	\$900.00
12/06/2023	JM	Drafting Motion	Complete first draft of MIL to exclude D's expert	\$500.00	3.6	\$1,800.00
12/08/2023	AC	Research	research for policymaker motion	\$250.00	2.5	\$625.00
12/11/2023	AC	Drafting Motion	conferring with John and editing motion to find policymaker authority delegation	\$250.00	3.1	\$775.00
12/11/2023	JM	Document Review	Review draft motion re: policymaking authority; confer w/ Abby Cook re: same	\$500.00	1.3	\$650.00
12/13/2023	MP	Case strategy discussion	Team meeting re: MILs	\$110.00	1.0	\$110.00
12/13/2023	JM	Internal Meeting	Prepare for and meet w/ legal team and counsel for Olsen re: MILS and trial strategy	\$500.00	1.2	\$600.00
12/17/2023	AC	Drafting Motion	research for policymaker MiL - adding Collett	\$250.00	0.6	\$150.00
12/17/2023	AC	Drafting Motion	drafting policymaker motion - adding Collett and making edits	\$250.00	3.2	\$800.00
12/19/2023	JM	Drafting Motion	Review and revise draft MIL re: policymaker authority	\$500.00	1.5	\$750.00
01/02/2024	JM	Draft correspondence	Draft correspondence to opp counsel re: calling D's expert at trial	\$500.00	0.3	\$150.00
01/03/2024	AC	Document Review	Review UDC report and evidence	\$250.00	3.5	\$875.00
01/04/2024	AC	Document Review	Preparing designation of Toledo testimony	\$250.00	3.7	\$925.00
01/04/2024	JM	Document Review	Review court order on 1927 fees; legal research re: hostile witnesses	\$500.00	0.9	\$450.00
01/05/2024	AC	Document Review	Review UDC report and evidence	\$250.00	2.1	\$525.00
01/05/2024	JM	Research	Legal research and draft motion to call D's expert at trial	\$500.00	2.8	\$1,400.00
01/07/2024	AC	Document Review	Preparing designation of Toledo testimony	\$250.00	2.1	\$525.00
01/08/2024	AC	Document Review	Review UDC report and evidence	\$250.00	2.4	\$600.00
01/08/2024	JM	Research	Finalize research and drafting motion re: calling D's expert; file same	\$500.00	1.3	\$650.00
01/11/2024	JM	Drafting Motion	Final edit of motion re: policymaking authority; legal research and drafting MIL to admit Jorgensen PIA; continue to work on draft MIL to exclude D's expert	\$500.00	7.4	\$3,700.00
01/12/2024	MP	Document Preparation	Reviewing MILs for edits. Filing MILs.	\$110.00	6.0	\$660.00
01/12/2024	JM	Drafting Motion	Finalize MIL to exclude D's expert and admit PIA; edit motion to sequester Jorgensen; review and approve MILs filed by Olsen's counsel; prepare draft proposed orders	\$500.00	5.5	\$2,750.00
01/15/2024	JM	Document Review	Review Daggett's MILs; begin legal research re: same	\$500.00	4.1	\$2,050.00
01/16/2024	TF	Document Review	Case file and Pleadings review	\$250.00	4.5	\$1,125.00
01/16/2024	TF	Research	1983 claim legal research	\$250.00	2.0	\$500.00
01/16/2024	JM	Research	Begin legal research and drafting opp'n to Daggett's motion to exclude PIAs and other criminal case info	\$500.00	3.1	\$1,550.00
01/17/2024	TF	Document Review	Drollette Deposition review	\$250.00	2.0	\$500.00
01/17/2024	TF	Research	FRE 702/Daubert research	\$250.00	2.5	\$625.00



01/18/2024	TF	Drafting Motion	Hobfoll MIL response	\$250.00	2.5	\$625.00
01/18/2024	AC	Drafting Motion	Reviewing motion in limine to frasier testimony and outline response	\$250.00	2.2	\$550.00
01/18/2024	AC	Research	research for response to Frasier motion in limine	\$250.00	2.6	\$650.00
01/18/2024	AC	Drafting Motion	Draft response to Frasier motion in limine	\$250.00	3.6	\$900.00
01/19/2024	TF	Document Review	Depo review, proof chart	\$250.00	3.0	\$750.00
01/19/2024	TF	Case strategy discussion	evidence chart organization	\$250.00	1.0	\$250.00
01/19/2024	TF	Drafting Motion	Hobfoll MIL response	\$250.00	2.5	\$625.00
01/19/2024	TF	Research	Psychological Expert Case Law Review	\$250.00	2.0	\$500.00
01/19/2024	MP	Case strategy discussion	Team meeting re: proof chart.	\$110.00	2.0	\$220.00
01/19/2024	JM	Research	Continue research and drafting oppn to Daggett's PIA MIL; meet w/ internal legal team re: proof chart for trial preparation purposes	\$500.00	3.9	\$1,950.00
01/22/2024	AC	Drafting Motion	Draft response to Frasier motion in limine	\$250.00	3.6	\$900.00
01/22/2024	TF	Drafting Motion	MIL response - Hobfoll	\$250.00	4.0	\$1,000.00
01/22/2024	JM	Correspondance	Correspondence w/ opposing counsel re: extension; legal research re: psychological expert reports	\$500.00	2.4	\$1,200.00
01/23/2024	AC	Drafting Motion	Review and edit response to Hobbfall motion in limine	\$250.00	2.6	\$650.00
01/23/2024	AC	Research	Research for response to Hobbfall motion in limine	\$250.00	0.8	\$200.00
01/23/2024	TF	Drafting Motion	MIL response - Kantorova	\$250.00	3.0	\$750.00
01/23/2024	TF	Case strategy discussion	Audio Review - Drollette and Olsen	\$250.00	1.0	\$250.00
01/23/2024	TF	Expert Witness Preparation	TC with Dr. Kantorova - MIL response	\$250.00	0.5	\$125.00
01/23/2024	TF	Drafting Motion	MIL response - Kantorova - post call revisions	\$250.00	1.5	\$375.00
01/23/2024	AC	Document Review	Review UDC interview recordings	\$250.00	2.0	\$500.00
01/23/2024	MP	Document Review	Review of audio of UDC interviews.	\$110.00	2.0	\$220.00
01/23/2024	JM	Document Review	Listen to audio recordings of DOC interviews w/ Plaintiffs to prep for trial; review Daggett's response to motion to call D's expert; legal research re: same	\$500.00	2.9	\$1,450.00
01/24/2024	AC	Drafting Motion	Review, edit, and proof response to Frasier motion in limine	\$250.00	1.3	\$325.00
01/24/2024	TF	Drafting Motion	MIL response - Kantorova	\$250.00	2.0	\$500.00
01/24/2024	TF	Drafting Motion	MIL response - Hobfoll - edits/revisions	\$250.00	2.0	\$500.00
01/24/2024	TF	Correspondance	Email to Opp. Counsel - sealing confidential expert reports	\$250.00	0.3	\$75.00
01/24/2024	JM	Document Review	Review Daggett's opp to motion to call D's expert and policymaking authority motion; legal research re: same	\$500.00	1.5	\$750.00
01/25/2024	TF	Research	Admissibility of party opponent research	\$250.00	2.5	\$625.00
01/25/2024	JM	Drafting Motion	Continue edits to draft oppositions to all of Daggett's MILs and legal research re: same	\$500.00	3.0	\$1,500.00
01/26/2024	TF	Drafting Motion	MIL response - excluding Dr. Hobfoll	\$250.00	2.0	\$500.00
01/26/2024	MP	Document Review	Review of MIL Opps for edits. Filing.	\$110.00	6.0	\$660.00

01/26/2024	JM	Drafting Motion	Finalize opp to all of Daggett's MILs; file opp to MILS	\$500.00	2.2	\$1,100.00
01/29/2024	JM	Document Review	Review Daggett's oppns to Plaintiffs' MILs; begin legal research re: same; prepare and file motion for excess pages for oppn	\$500.00	3.7	\$1,850.00
01/30/2024	TF	Document Review	Stewart Report - Opinion review for admissibility/MIL to exclude	\$0.00	2.0	\$0.00
01/30/2024	JM	Research	Continue legal research and begin drafting of reply ISO MIL to exclude D's expert and include Jorgensen PIA	\$500.00	1.7	\$850.00
01/31/2024	AC	Research	Research for reply to MiL 7 sequestering Jorgensen - switching 30(b)(6) reps	\$250.00	2.6	\$650.00
01/31/2024	AC	Drafting Motion	Drafting reply to MiL 7 sequestering Jorgensen	\$250.00	4.0	\$1,000.00
01/31/2024	TF	Research	Reply - Calling Stewart during Case in Chief	\$250.00	3.0	\$750.00
02/01/2024	AC	Drafting Motion	Editing reply to MiL 7 sequestering Jorgensen	\$250.00	0.8	\$200.00
02/01/2024	AC	Drafting Motion	Reviewing and editing reply MiL Stewart	\$250.00	0.8	\$200.00
02/01/2024	TF	Drafting Motion	Reply - Calling Stewart during Case in Chief	\$250.00	4.0	\$1,000.00
02/01/2024	TF	Research	Reply - Calling Stewart during Case in Chief	\$250.00	1.0	\$250.00
02/01/2024	JM	Drafting Motion	Finalize draft reply ISO MIL to exclude expert and include Jorgensen PIA; correspondence w/ counsel for Logan Walker and opp counsel re: remote testimony	\$500.00	2.3	\$1,150.00
02/02/2024	AC	Drafting Motion	Drafting and editing reply to MiL 7 sequestering Jorgensen	\$250.00	2.1	\$525.00
02/02/2024	TF	Drafting Motion	Reply - Calling Stewart during Case in Chief	\$250.00	2.0	\$500.00
02/02/2024	MP	Document Review	Review of MIL replies for edits. Filing	\$110.00	4.0	\$440.00
02/02/2024	JM	Drafting Motion	Final edits to replies ISO affirmative MILS; review Daggett's replies ISO D's MILS	\$500.00	3.0	\$1,500.00
02/05/2024	AC	Research	Research for reply to policymaker motion	\$250.00	1.4	\$350.00
02/05/2024	AC	Drafting Motion	Drafting reply to policymaker motion	\$250.00	4.0	\$1,000.00
02/05/2024	AC	Drafting Motion	Editing reply to motion to call Stewart	\$250.00	0.6	\$150.00
02/05/2024	TF	Drafting Motion	Reply - Calling Stewart during Case in Chief	\$250.00	3.0	\$750.00
02/06/2024	AC	Drafting Motion	Drafting reply to policymaker motion	\$250.00	1.6	\$400.00
02/06/2024	TF	Drafting Motion	Reply - Calling Stewart during Case in Chief	\$250.00	3.0	\$750.00
02/06/2024	AC	Document Review	Review UDC interview recordings	\$250.00	2.0	\$500.00
02/06/2024	MP	Document Review	Review of audio of UDC interviews.	\$110.00	2.0	\$220.00
02/06/2024	JM	Drafting Motion	Edits to reply ISO motion to call Stewart; review potential depo designations for R. Toledo; listen to UDC audio recordings of trial witnesses; correspondence w/ counsel for Logan Walker re: potential testimony	\$500.00	2.9	\$1,450.00
02/07/2024	AC	Drafting Motion	Finalizing and filing policymaker motion	\$250.00	2.3	\$575.00
02/07/2024	JM	Drafting Motion	Edits to reply ISO motion re: policymaking authority	\$500.00	0.4	\$200.00
02/08/2024	AC	Document Review	Reviewing Cox's Deposition and drafting depo summary	\$250.00	1.6	\$400.00
02/12/2024	AC	Document Review	Reviewing Cox's Deposition and drafting depo summary	\$250.00	3.6	\$900.00
02/12/2024	AC	Document Preparation	Drafting Deputy Cox's cross questions	\$250.00	1.8	\$450.00
02/13/2024	AC	Document Review	Review UDC interview recordings	\$250.00	2.0	\$500.00

02/13/2024	AC	Document Preparation	Editing joint trial notice, reviewing exhibits for same, finalizing facts	\$250.00	3.5	\$875.00
02/13/2024	AC	Document Preparation	Drafting Deputy Cox's cross questions	\$250.00	6.0	\$1,500.00
02/13/2024	MP	Document Review	Review of audio of UDC interviews.	\$110.00	2.0	\$220.00
02/13/2024	JM	Document Review	Review recordings of UDC interviews w/ trial witnesses; begin cross examination outline of B. Lail	\$500.00	3.6	\$1,800.00
02/14/2024	TF	Drafting Motion	Draft motion to call Walker remotely	\$250.00	6.0	\$1,500.00
02/14/2024	AC	Case strategy discussion	Meet w/ full legal team re: trial strategy and exhibits	\$250.00	1.3	\$325.00
02/14/2024	AC	Document Preparation	Drafting Deputy Cox's cross questions	\$250.00	2.0	\$500.00
02/14/2024	MP	Case strategy discussion	Team call re: exhibits and trial schedule.	\$110.00	1.0	\$110.00
02/14/2024	JM	Case strategy discussion	Meet w/ internal team re: trial strategy and exhibits; continue cross examination outline for B. Lail	\$500.00	2.8	\$1,400.00
02/15/2024	TF	Drafting Motion	Draft motion to call Walker remotely	\$250.00	6.0	\$1,500.00
02/16/2024	TF	Drafting Motion	Finalize motion to call Walker remotely	\$250.00	2.0	\$500.00
02/16/2024	TF	Document Review	Review joint trial notice	\$250.00	1.5	\$375.00
02/16/2024	JM	Drafting Motion	Review/edit draft motion to call Walker remotely; review memo re: Cox admission; edit and finalize draft joint trial order; complete B. Lail cross outline	\$500.00	4.2	\$2,100.00
02/20/2024	TF	Document Preparation	File Motion to call Walker remotely/proposed order	\$250.00	2.0	\$500.00
02/20/2024	AC	Drafting Motion	Review Walker motion to testify remotely	\$250.00	0.6	\$150.00
02/20/2024	JM	Document Review	Final review of draft motion/proposed order to call Walker remotely; preliminary legal research re: preliminary JIs	\$500.00	2.3	\$1,150.00
02/21/2024	TF	Research	Eggshell damage instruction research	\$250.00	2.0	\$500.00
02/21/2024	TF	Document Review	Toledo deposition review	\$250.00	4.0	\$1,000.00
02/22/2024	TF	Expert Witness Preparation	Expert report review (Stewart, Kantorova, Hobfoll)	\$250.00	4.0	\$1,000.00
02/23/2024	TF	Internal Meeting	UDC Audio review (Toledo and Lail)	\$250.00	1.5	\$375.00
02/23/2024	AC	Document Review	Review UDC interview recordings	\$250.00	2.0	\$500.00
02/23/2024	MP	Document Review	Review of audio of UDC interviews.	\$110.00	2.0	\$220.00
02/23/2024	AC	Document Review	UDC interview audio review	\$250.00	2.0	\$500.00
02/27/2024	AC	Document Review	Review UDC interview recordings	\$250.00	3.2	\$800.00
02/27/2024	MP	Document Review	Review of audio of UDC interviews.	\$110.00	2.0	\$220.00
02/27/2024	JM	Trial Preparation	Review D's proposed joint trial notice; legal research re: same; draft objections to same; listen to UDC audio of interviews w/ trial witnesses; start work on identification of trial exhibits	\$500.00	5.6	\$2,800.00
02/28/2024	MP	Correspondance	Attended meet and confer with opposing counsel.	\$110.00	1.0	\$110.00
02/28/2024	JM	Trial Preparation	Prepare for and attend in person meet and confer re: joint trial notice; begin drafting proposed prelim JIs; legal research re: same; update joint draft trial notice; continue work on identification of trial exhibits	\$500.00	5.4	\$2,700.00
02/29/2024	MP	Correspondance	Attended meet and confer with opposing counsel.	\$110.00	1.0	\$110.00

02/29/2024	JM	Trial Preparation	Revise undisputed fact section of joint trial notice; attend meet and confer w/ opposing counsel; continue drafting proposed prelim JIs; legal research re: same; continue work on identification of trial exhibits	\$500.00	5.5	\$2,750.00
03/01/2024	JM	Trial Preparation	Correspondence w/ opposing counsel re: extension and edit proposed motion re: same; complete initial proposed prelim JIs; legal research re: same; continue work on identification of trial exhibits	\$500.00	4.7	\$2,350.00
03/03/2024	JM	Trial Preparation	Begin legal research and draft general jury instructions; continue to work on identification of trial exhibits	\$500.00	3.5	\$1,750.00
03/04/2024	MP	Administrative	Reviewed records on witnesses. Requested skip traces for trial witnesses.	\$110.00	0.5	\$55.00
03/04/2024	JM	Trial Preparation	Correspondence w/ court and counsel re: scheduling; begin drafting questions for S. Stewart; review draft voir dire questions; continue research and drafting general JIs	\$500.00	5.6	\$2,800.00
03/05/2024	MP	Document Review	Review of UDC audio interviews.	\$110.00	2.0	\$220.00
03/05/2024	MP	Administrative	Reviewed skip traces. Drafted subpoenas. Sent subpoenas out for service.	\$110.00	1.0	\$110.00
03/05/2024	AC	Document Review	Review UDC interview recordings	\$250.00	2.0	\$500.00
03/05/2024	JM	Trial Preparation	Review oppn to motion to allow Walker to appear by video; legal research re: same; continue drafting questions for S. Stewart; finalize initial draft of general JIs; listen to audio of UDC recordings of trial witnesses	\$500.00	4.5	\$2,250.00
03/06/2024	MP	Case strategy discussion	Meeting w/ co-counsel re: trial prep.	\$110.00	1.0	\$110.00
03/06/2024	AC	Internal Meeting	Meeting with all plaintiffs' counsel re: trial prep	\$250.00	1.0	\$250.00
03/06/2024	AC	Expert Witness Preparation	Trial Prep with Kantorova	\$250.00	1.0	\$250.00
03/06/2024	JM	Trial Preparation	Trial team prep meeting; begin outline of cross examination of N. Ettleman; review and edit draft verdict form	\$500.00	5.1	\$2,550.00
03/07/2024	TF	Drafting Motion	Reply - Walker testifying remotely at trial.	\$250.00	3.5	\$875.00
03/07/2024	JM	Trial Preparation	Begin affidavit ISO motion to allow Walker to testify remotely; review and edit draft reply re: same; continue outline of cross examination of N. Ettleman; revise and finalize draft JIs, verdict form, and voir dire	\$500.00	4.8	\$2,400.00
03/08/2024	TF	Drafting Motion	Request for Decision - Walker testifying remotely	\$250.00	0.8	\$187.50
03/08/2024	JM	Trial Preparation	Make final edits to reply ISO Walker motion; complete cross examination outline of B. Lail; review draft outline of questions for J. Cox; review Daggett's proposed JIs, verdict form, and voir dire; begin legal research re: same; begin objections re: same	\$500.00	6.9	\$3,450.00
03/10/2024	MP	Expert Witness Preparation	Call w/ Dr. Hobfoll.	\$110.00	1.0	\$110.00
03/11/2024	AC	Internal Meeting	Review Cox depo w/ John	\$250.00	1.0	\$250.00
03/11/2024	AC	Internal Meeting	Internal meeting with all plaintiffs' counsel re: jury instructions, voir dire, verdict sheer	\$250.00	1.5	\$375.00
03/11/2024	JM	Trial Preparation	Meet w/ internal and Olsen team re: JIs; prepare exhibit for Walker motion; begin drafting questions for J. Asay; communications w/ opp counsel re: trial brief; review Cox deposition	\$500.00	4.4	\$2,200.00

03/12/2024	AC	Document Preparation	Review Thompson deposition and draft depo summary	\$250.00	2.3	\$575.00
03/12/2024	AC	Document Preparation	Revise voir dire with edits from co-counsel	\$250.00	0.5	\$125.00
03/12/2024	JM	Trial Preparation	Review and revise joint trial w/ opp counsel objections and plaintiff objections; legal research re: same; continue questions for J. Asay; continue to listen to UDC interview audio with trial witnesses; correspondence w/ counsel for Walker re: Walker declaration; review draft of same	\$500.00	5.6	\$2,800.00
03/13/2024	TF	Document Preparation	Kantorova trial examination outline and prep	\$0.00	5.0	\$0.00
03/13/2024	AC	Correspondance	In person meet and confer with opp. counsel re: jury instructions, voir dire, verdict sheet	\$250.00	1.0	\$250.00
03/13/2024	AC	Document Preparation	Review Thompson deposition and draft depo summary	\$250.00	1.0	\$250.00
03/13/2024	MP	Correspondance	Attended meet and confer with opposing counsel.	\$110.00	0.5	\$55.00
03/13/2024	JM	Trial Preparation	Meet and confer w/ opp counsel re: Jls, verdict form and voir dire questions; continue legal research re: same; begin drafting questions for D. Housely	\$500.00	6.2	\$3,100.00
03/14/2024	AC	Document Preparation	Review/edit proposed jury instruction	\$250.00	1.2	\$300.00
03/14/2024	AC	Document Preparation	Draft policymaker instruction	\$250.00	0.5	\$125.00
03/14/2024	MP	Administrative	Research on alternative methods of service to Daggett County.	\$110.00	1.0	\$110.00
03/14/2024	JM	Trial Preparation	Finalize and file draft Jls, verdict form, and voir dire- correspondence w/ Court and opposing counsel re: same; continue drafting questions for D. Housely; review discovery re: same; begin draft objections to D's Jls and form	\$500.00	4.9	\$2,450.00
03/15/2024	TF	Research	Eggshell theory caselaw and jury instruction research	\$250.00	2.0	\$500.00
03/15/2024	AC	Document Preparation	Drafting opening	\$250.00	2.0	\$500.00
03/15/2024	AC	Document Preparation	Review and edit proposed objections to defendant's jury instruction	\$250.00	1.5	\$375.00
03/15/2024	JM	Trial Preparation	Revise and finalize objections to D's Jls and verdict form; legal research re: same; correspondence w/ opposing counsel re: same; review D's objections to P's proposals; assist with opening argument draft; finish draft Housely outline; begin drafting closing argument outline	\$500.00	7.2	\$3,600.00
03/16/2024	AC	Document Preparation	Drafting opening	\$250.00	2.0	\$500.00
03/16/2024	JM	Trial Preparation	Begin drafting Jorgensen direct exam; continue outline of closing argument	\$500.00	2.2	\$1,100.00
03/17/2024	MP	Case strategy discussion	Internal team meeting	\$110.00	0.5	\$55.00
03/17/2024	JM	Trial Preparation	Continue drafting Jorgensen direct exam; review discovery re: same; legal research re jury instructions; draft response to P's objections to Jls	\$500.00	3.5	\$1,750.00
03/18/2024	AC	Document Preparation	Review and edit proposed objections to defendant's jury instruction	\$250.00	0.8	\$200.00

03/18/2024	JM	Trial Preparation	Correspondence w/ court and opposing counsel re: pretrial issues; legal research re jury instructions on 8th amendment elements and collateral source rule; complete draft of response to objections to JIs and draft motion to file out of time; review witness outlines for A. Cook and T. Ford	\$500.00	2.5	\$1,250.00
03/19/2024	TF	Document Preparation	Hobfoll trial examination outline	\$250.00	4.0	\$1,000.00
03/19/2024	AC	Research	Service of subpoena research	\$250.00	0.6	\$150.00
03/19/2024	AC	Document Review	Review depositions of Asay and Drollette before trial prep	\$250.00	2.5	\$625.00
03/20/2024	TF	Case strategy discussion	Pre trial meeting with Plaintiffs' counsel	\$250.00	1.5	\$375.00
03/20/2024	TF	Document Review	Frasier expert report review	\$0.00	2.5	\$0.00
03/20/2024	AC	Internal Meeting	Pre-trial meeting with all Plaintiffs' counsel	\$250.00	1.5	\$375.00
03/20/2024	AC	Document Preparation	Drafting opening	\$250.00	3.5	\$875.00
03/20/2024	AC	Document Preparation	Review Dupaix deposition and draft depo summary	\$250.00	2.0	\$500.00
03/20/2024	MP	Administrative	Meeting w/ co-counsel re: trial prep.	\$110.00	0.7	\$77.00
03/20/2024	AC	Document Review	Review Lt. Lail's plea, deposition, and UDC interviews	\$250.00	4.0	\$1,000.00
03/20/2024	JM	Trial Preparation	Pre-trial meeting w/ all Plaintiffs' legal teams; review and edit trial witness outlines	\$500.00	3.2	\$1,600.00
03/21/2024	TF	Client Meeting	Trial prep with Mr. Asay	\$250.00	2.0	\$500.00
03/21/2024	TF	Expert Witness Preparation	Trial prep with Frasier	\$250.00	1.5	\$375.00
03/21/2024	AC	Document Preparation	Draft Dupaix cross questions	\$250.00	2.0	\$500.00
03/21/2024	AC	Client Meeting	Trial prep with Joshua Asay	\$250.00	1.5	\$375.00
03/21/2024	AC	Expert Witness Preparation	Trial prep with Margo Fraiser	\$250.00	1.5	\$375.00
03/21/2024	MP	Communication with Client	Meeting with client Joshua Asay to prepare for trial.	\$110.00	1.5	\$165.00
03/21/2024	JM	Trial Preparation	Meet w/ J. Asay and team in person to prepare for direct; review rules re: jury composition; update closing argument draft	\$500.00	1.9	\$950.00
03/22/2024	TF	Expert Witness Preparation	Trial prep with Hobfoll	\$250.00	1.0	\$250.00
03/22/2024	AC	Hearing Preparation	Moot opening with J. Holberg	\$250.00	1.4	\$350.00
03/22/2024	AC	Document Preparation	Drafting opening	\$250.00	1.3	\$325.00
03/22/2024	MP	Deposition preparation	Prepared exhibit and witness list. Filed with court.	\$110.00	0.5	\$55.00
03/22/2024	AC	Document Review	Review Lt. Lail's plea, deposition, and UDC interviews	\$250.00	1.5	\$375.00
03/22/2024	AC	Document Preparation	Draft Lt. Lail depo summary	\$250.00	1.0	\$250.00



03/22/2024	JM	Trial Preparation	Assist in finalizing P's exhibit and trial witness lists; conduct review of UDC and Daggett discovery to ensure completeness of exhibit list; review Jorgensen and Lail depositions to update trial outlines	\$500.00	4.3	\$2,150.00
03/23/2024	JM	Trial Preparation	Begin drafting cross examination outline for D. Pease; review of discovery re: same	\$500.00	2.5	\$1,250.00
03/24/2024	JM	Trial Preparation	Complete draft cross exam outline for D. Pease; draft cross exam outline for C. Mortensen; review of discovery re: same	\$500.00	5.0	\$2,500.00
03/25/2024	AC	Client Meeting	Trial prep with Joshua Asay	\$250.00	1.0	\$250.00
03/25/2024	MP	Communication with Client	Attended meeting with Joshua Asay to prepare for trial.	\$110.00	1.0	\$110.00
03/25/2024	TF	Document Preparation	Drollette Direct Prep	\$250.00	6.0	\$1,500.00
03/25/2024	JM	Trial Preparation	Continue to draft Jorgensen direct examination; meet w/ J. Asay to prepare for trial; update J. Asay direct exam questions; prepare for final pretrial conference; attend moot opening session	\$500.00	5.9	\$2,950.00
03/26/2024	AC	Internal Meeting	Moot opening with legal panel	\$250.00	1.5	\$375.00
03/26/2024	MP	Communication with Client	Attended meeting with Steven Drollette to prepare for trial.	\$110.00	2.0	\$220.00
03/26/2024	MP	Administrative	Calls with Uintah Co. Sheriff re: service of subpoenas.	\$110.00	0.7	\$77.00
03/26/2024	AC	Client Meeting	Trial prep with Steven Drollette	\$250.00	1.3	\$325.00
03/26/2024	AC	Internal Meeting	Meeting with all Plaintiffs' counsel re: preparation for pretrial conference and witnesses/subpoenas	\$250.00	1.0	\$250.00
03/26/2024	AC	Hearing Preparation	Preparation for final pretrial conference	\$250.00	1.0	\$250.00
03/26/2024	TF	Client Meeting	Meeting with Drollette	\$250.00	3.0	\$750.00
03/26/2024	TF	Hearing Preparation	PTC Prep	\$250.00	5.0	\$1,250.00
03/26/2024	JM	Trial Preparation	Continue to prepare for final pretrial conference; update trial witness outlines for all witnesses; review opening argument draft; update closing argument outline; draft cross examination of S. Lamb; review of discovery re: same	\$500.00	4.3	\$2,150.00
03/27/2024	MP	Administrative	Calendaring of deadlines from FPTC. Email to OC re: scheduling meet and confer.	\$110.00	0.3	\$33.00
03/27/2024	AC	Court Attendance	Court: final pretrial conference + testing tech	\$250.00	7.5	\$1,875.00
03/27/2024	AC	Internal Meeting	Debrief and plan next motions/briefs with all plaintiffs' counsel after final pretrial conference	\$250.00	1.0	\$250.00
03/27/2024	TF	Court Attendance	PTC	\$250.00	8.0	\$2,000.00
03/27/2024	JM	Trial Preparation	Attend final pretrial conference; attend plaintiff legal team strategy session; review court orders from FPTC	\$500.00	8.5	\$4,250.00
03/28/2024	MP	Case strategy discussion	Team call re: oppositions to MILs.	\$110.00	1.0	\$110.00
03/28/2024	MP	Court Attendance	Attended final pretrial conference. Arrived early to test tech in courtroom to prepare for trial.	\$110.00	7.5	\$825.00
03/28/2024	AC	Document Preparation	Workshopping opening after rulings in pretrial conference	\$250.00	1.2	\$300.00



03/28/2024	JM	Trial Preparation	Update Jorgensen direct; review court orders; correspondence w/ opp counsel re: Toledo service issue; legal research re: party opponent exception to hearsay rule	\$500.00	2.1	\$1,050.00
03/29/2024	AC	Correspondance	Meet and confer with opposing counsel re: jury instructions, redactions of plea, taser demonstrative	\$250.00	0.9	\$225.00
03/29/2024	AC	Document Preparation	Revising opening with moot notes	\$250.00	0.5	\$125.00
03/29/2024	AC	Document Review	Review Dr. Hobfoll's expert reports re: drollette and Porter	\$250.00	1.5	\$375.00
03/29/2024	TF	Research	Travel to Opp. Counsel's office to look at physical taser	\$250.00	1.0	\$250.00
03/29/2024	TF	Hearing Preparation	Toledo cross examination prep	\$250.00	3.0	\$750.00
03/30/2024	AC	Research	Research for offset application	\$250.00	2.0	\$500.00
03/30/2024	AC	Drafting Motion	Drafting brief in response to the Court's question on offset	\$250.00	2.5	\$625.00
03/31/2024	AC	Drafting Motion	Drafting brief in response to the Court's question on apportionment	\$250.00	1.5	\$375.00
03/31/2024	AC	Research	Research on apportionment	\$250.00	1.3	\$325.00
03/31/2024	AC	Research	Research on offset/ripeness	\$250.00	0.8	\$200.00
03/31/2024	AC	Drafting Motion	Drafting brief for apportionment and offset, proofread & edits	\$250.00	1.0	\$250.00
03/31/2024	JM	Trial Preparation	Assist w/ drafting memo re: Burke v. Regalado; legal research re: same; review pre-trial pleadings	\$500.00	1.2	\$600.00
04/01/2024	MP	Document Review	Reviewing offset brief for edits/cites.	\$110.00	0.5	\$55.00
04/01/2024	MP	Document Preparation	Drafted letter to Toledo re: settlement offers.	\$110.00	0.4	\$44.00
04/01/2024	MP	Document Management	Trial binder prep.	\$110.00	1.0	\$110.00
04/01/2024	MP	Document Review	Review + edits of mot. re: Toledo dep designations.	\$110.00	0.4	\$44.00
04/01/2024	MP	Administrative	Communications with process server re: subpoena service on Toledo. Summary of attempts of service on Toledo.	\$110.00	0.3	\$33.00
04/01/2024	MP	Correspondance	Communications with court and counsel for Walker re: Walker's testimony at trial.	\$110.00	0.3	\$33.00
04/01/2024	AC	Document Preparation	Drafting Ben Lail depo summary	\$250.00	1.5	\$375.00
04/01/2024	AC	Document Preparation	Revise opening and condense to outline form	\$250.00	1.2	\$300.00
04/01/2024	TF	Drafting Motion	Drafting motion to declare Toledo unavailable	\$250.00	4.0	\$1,000.00
04/01/2024	JM	Trial Preparation	Review brief re: Jorgensen PIA; legal research re: same; being assisting in drafting of response to same; research re: waiver of PLRA defense; review and legal research re: D's proposed JI; review draft motion re: Toledo availability	\$500.00	2.8	\$1,400.00
04/02/2024	MP	Document Management	Emailed proposed order re: ECF No. 371 to chambers. Downloaded pleadings.	\$110.00	0.2	\$22.00
04/02/2024	AC	Research	Researching expungement of criminal pleas/conduct	\$250.00	2.3	\$575.00
04/02/2024	AC	Drafting Motion	Drafting response to Def additional briefing on expungement of Jorgensen plea	\$250.00	3.0	\$750.00

04/02/2024	AC	Internal Meeting	Confer with John and Tom re: expungement briefing, subpoena issues, upcoming deadlines	\$250.00	0.6	\$150.00
04/02/2024	TF	Correspondance	Correspondence with AG's over declassifying UDC report and exhibits	\$250.00	1.5	\$375.00
04/02/2024	TF	Correspondance	Correspondence with opposing counsel, PLRA exhaustion issue	\$250.00	0.5	\$125.00
04/02/2024	TF	Hearing Preparation	Direct examination of Kantorova prep	\$250.00	3.0	\$750.00
04/02/2024	JM	Drafting Motion	Continue assisting with brief re: Jorgensen PIA; legal research re: same	\$500.00	1.2	\$600.00
04/03/2024	AC	Drafting Motion	Drafting response to Def. briefing on expungement of Jorgensen plea	\$250.00	2.2	\$550.00
04/03/2024	AC	Internal Meeting	Moot opening	\$250.00	1.4	\$350.00
04/03/2024	AC	Document Preparation	Drafting and editing opening and opening demonstratives	\$250.00	3.5	\$875.00
04/03/2024	AC	Drafting Motion	Editing briefing re: expungement of Jorgensen's plea	\$250.00	1.0	\$250.00
04/03/2024	AC	Document Preparation	Draft Lail cross questions	\$250.00	1.5	\$375.00
04/03/2024	MP	Document Preparation	Preparing trial binders	\$110.00	3.5	\$385.00
04/03/2024	MP	Document Preparation	Proofreading and filing brief ISO apportionment + offset.	\$110.00	0.8	\$88.00
04/03/2024	MP	Case strategy discussion	Attend opening moot.	\$110.00	1.0	\$110.00
04/03/2024	TF	Expert Witness Preparation	Prep meeting with expert Dr. Kantorova	\$250.00	1.5	\$375.00
04/03/2024	TF	Document Review	Review P's response to Daggett's expungement briefing	\$250.00	1.0	\$250.00
04/03/2024	TF	Document Review	Review and edits to P's letter to Toledo re: offer of settlement	\$250.00	1.0	\$250.00
04/03/2024	TF	Case strategy discussion	Internal case strategy discussion	\$250.00	1.3	\$312.50
04/03/2024	JM	Document Review	Review draft Burke brief; review D's Burke brief; review D's brief re: consent; continue research and assisting in drafting re: PIA	\$500.00	2.3	\$1,150.00
04/04/2024	MP	Correspondance	Communication to subpoenaed witnesses re: trial testimony logistics.	\$110.00	1.0	\$110.00
04/04/2024	TF	Correspondance	Correspondence with Logan Walker and R. Cummings, re: remote testimony	\$250.00	0.5	\$125.00
04/04/2024	TF	Hearing Preparation	Direct examination of Logan Walker prep	\$250.00	4.8	\$1,187.50
04/04/2024	JM	Drafting Motion	Finalize assistance w/ brief re: PIA; review D's brief re: Toledo; work on potential stipulated facts; file same	\$500.00	2.1	\$1,050.00
04/05/2024	TF	Hearing Preparation	Direct examination of Toledo prep	\$250.00	2.0	\$500.00
04/05/2024	TF	Hearing Preparation	Direct exam of Holly Dick prep	\$250.00	4.8	\$1,187.50
04/05/2024	TF	Hearing Preparation	Direct exam of Nola Ettleman prep	\$250.00	4.0	\$1,000.00

04/05/2024	JM	Document Review	Review D's reply re: Burke; review D's emergency motion to seal; review D's proposed redactions to and sealing of PIA; begin oppn re: same; legal research re: same	\$500.00	2.6	\$1,300.00
04/06/2024	MP	Communication with Client	Communication with Asay re: trial logistics.	\$110.00	0.5	\$55.00
04/06/2024	JM	Drafting Motion	Complete and file research and drafting of motion to seal/redact PIA; update Jorgensen direct	\$500.00	1.9	\$950.00
04/07/2024	MP	Case strategy discussion	Meeting re: trial preparations, assistance with direct preparations, review of discovery videos.	\$110.00	5.5	\$605.00
04/07/2024	TF	Internal Meeting	Pre trial internal meeting: trial preparations, assistance with direct preparations, review of discovery videos.	\$250.00	4.5	\$1,125.00
04/07/2024	JM	Trial Preparation	Final trial preparations; review initial witness outlines; assist with opening argument draft; consult with Plaintiffs' counsel; prepare for arguments on outstanding pre-trial matters	\$500.00	5.5	\$2,750.00
04/08/2024	AC	Court Attendance	Trial day 1	\$250.00	7.0	\$1,750.00
04/08/2024	AC	Internal Meeting	Internal meeting re: debrief court, trial schedule, and strategy with all Plaintiffs' counsel	\$250.00	0.7	\$175.00
04/08/2024	MP	Court Attendance	Trial day 1	\$110.00	11.8	\$1,292.50
04/08/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/08/2024	JM	Trial Preparation	Attend first day of trial; jury selection; jury instructions; meet w/ Asay re: direct exam; meet w/ legal team re: strategy; continue drafting closing exam; assist with adjustments to opening argument; analyze court's rulings; prepare for arguments on evidentiary issues; finalize direct exam questions of Jorgensen; review discovery re: same; debrief w/ legal team	\$500.00	11.1	\$5,550.00
04/09/2024	AC	Court Attendance	Trial day 2	\$250.00	7.0	\$1,750.00
04/09/2024	AC	Internal Meeting	Internal meeting re: trial schedule and strategy with all Plaintiffs' counsel	\$250.00	1.1	\$275.00
04/09/2024	AC	Document Preparation	Review Dupaix UDC Interview and timestamps for disclosure to Defendant	\$250.00	1.5	\$375.00
04/09/2024	AC	Document Review	Review Thompson UDC Interview and timestamps for disclosure to Defendant	\$250.00	1.5	\$375.00
04/09/2024	MP	Court Attendance	Trial day 2	\$110.00	12.0	\$1,320.00
04/09/2024	TF	Court Attendance	Trial	\$250.00	10.0	\$2,500.00
04/09/2024	JM	Court Attendance	Attend second day of trial; examination of Jorgensen; debrief w/ legal team; prepare for day 3 of trial; assist w/ JI issues	\$500.00	11.5	\$5,750.00
04/10/2024	AC	Court Attendance	Trial day 3	\$250.00	6.5	\$1,625.00
04/10/2024	AC	Document Preparation	Edit direct question outline for Holly Dick and add UDC timestamps	\$250.00	2.7	\$675.00
04/10/2024	AC	Document Review	Review Holly Dick UDC interview	\$250.00	1.8	\$450.00
04/10/2024	AC	Internal Meeting	Internal meeting re: trial schedule and strategy with all Plaintiffs' counsel	\$250.00	0.6	\$150.00
04/10/2024	MP	Court Attendance	Trial day 3	\$110.00	10.0	\$1,100.00
04/10/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/10/2024	TF	Hearing Preparation	Drollette direct prep	\$250.00	2.5	\$625.00

04/10/2024	TF	Client Meeting	Meeting with S. Drollette	\$250.00	1.3	\$312.50
04/10/2024	JM	Court Attendance	Attend third day of trial; debrief w/ trial team; prepare for day 4 of trial; update witness questions; update closing outline; review D's proposed JI on 8th Am; legal research re: same	\$500.00	11.6	\$5,800.00
04/11/2024	AC	Court Attendance	Trial Day 4	\$250.00	6.5	\$1,625.00
04/11/2024	AC	Internal Meeting	Internal meeting re: trial schedule and strategy with all Plaintiffs' counsel	\$250.00	1.0	\$250.00
04/11/2024	MP	Court Attendance	Trial day 4	\$110.00	11.8	\$1,292.50
04/11/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/11/2024	TF	Expert Witness Preparation	Direct of Margo Frasier prep	\$250.00	4.5	\$1,125.00
04/11/2024	JM	Trial Preparation	Attend fourth day of trial; assist w/ response to proposed JI; debrief w/ team; prepare for day 5; update outlines for witnesses; debrief and prepare with clients	\$500.00	12.5	\$6,250.00
04/12/2024	AC	Court Attendance	Trial day 5	\$250.00	7.0	\$1,750.00
04/12/2024	AC	Case strategy discussion	Email communication with all plaintiffs' counsel re: trial schedule and strategy with all Plaintiffs' counsel	\$250.00	0.6	\$150.00
04/12/2024	MP	Court Attendance	Trial day 5	\$110.00	10.0	\$1,100.00
04/12/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/12/2024	JM	Trial Preparation	Attend fifth day of trial; debrief w/ team; prepare for day 6 of trial	\$500.00	13.0	\$6,500.00
04/13/2024	MP	Correspondance	Communication with expert witnesses and witnesses re: trial logistics and testimony time.	\$110.00	0.5	\$55.00
04/14/2024	AC	Research	Research re: ethics for prospective client confidentiality in preparation for Pryor cross	\$250.00	1.0	\$250.00
04/14/2024	MP	Correspondance	Preparation for trial day 6, transcript review, communication with witnesses	\$110.00	2.0	\$220.00
04/14/2024	TF	Expert Witness Preparation	Prep of Dr. Hobfoll	\$250.00	5.0	\$1,250.00
04/14/2024	JM	Trial Preparation	Prepare for day 6 of trial; update draft witness outlines; review transcripts from first week of trial re: same; update closing outline; internal legal team meeting	\$500.00	5.1	\$2,550.00
04/15/2024	AC	Research	Research re: informational interview before calling rebuttal witness	\$250.00	0.8	\$200.00
04/15/2024	MP	Court Attendance	Trial day 6	\$110.00	11.0	\$1,210.00
04/15/2024	AC	Court Attendance	Trial Day 6	\$250.00	7.5	\$1,875.00
04/15/2024	AC	Document Preparation	Prep for Holly Dick cross	\$250.00	1.4	\$350.00
04/15/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/15/2024	JM	Trial Preparation	Attend day 6 of trial; debrief w/ Plaintiffs' team; prepare for day 7 of trial	\$500.00	12.7	\$6,350.00
04/16/2024	MP	Court Attendance	Trial day 7	\$110.00	8.8	\$962.50
04/16/2024	AC	Court Attendance	Trial Day 7	\$250.00	6.5	\$1,625.00
04/16/2024	AC	Document Preparation	Designate Cox depo testimony in case of unavailability	\$250.00	1.8	\$450.00
04/16/2024	AC	Document Preparation	Review OC's Cox depo designations	\$250.00	0.8	\$200.00

04/16/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/16/2024	JM	Trial Preparation	Attend day 7 of trial; debrief w/ Plaintiffs' team; prepare for day 8 of trial; assist w/ designation of Cox transcript	\$500.00	12.5	\$6,250.00
04/17/2024	MP	Court Attendance	Trial day 8	\$110.00	9.0	\$990.00
04/17/2024	AC	Court Attendance	Trial day 8	\$250.00	7.0	\$1,750.00
04/17/2024	AC	Document Preparation	Cross designations and objections to Cox depo designation	\$250.00	0.6	\$150.00
04/17/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/17/2024	JM	Trial Preparation	Attend day 8 of trial; debrief /w Plaintiff's team; prepare for day 9 of trial; review transcript	\$500.00	13.5	\$6,750.00
04/18/2024	MP	Court Attendance	Trial day 9, preparation for closing.	\$110.00	15.5	\$1,705.00
04/18/2024	AC	Court Attendance	Trial day 9	\$250.00	7.5	\$1,875.00
04/18/2024	AC	Case strategy discussion	Internal meeting with ACLU team re: closing	\$250.00	1.6	\$400.00
04/18/2024	AC	Document Preparation	Draft closing	\$250.00	2.1	\$525.00
04/18/2024	AC	Document Preparation	Calculate proposed damages awards and add to closing and powerpoint	\$250.00	3.1	\$775.00
04/18/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/18/2024	TF	Internal Meeting	Closing arguments review/remaining trial issues team meeting	\$250.00	5.0	\$1,250.00
04/18/2024	JM	Trial Preparation	Attend day 9 of trial; debrief w/ Plaintiffs' team; finalize brief of closing argument; moot same; review trial transcript re: same; assist w/ JMOL	\$500.00	15.5	\$7,750.00
04/19/2024	MP	Court Attendance	Trial day 10	\$110.00	6.0	\$660.00
04/19/2024	AC	Court Attendance	Trial day 9 (closing)	\$250.00	4.2	\$1,050.00
04/19/2024	AC	Court Attendance	Jury Question #1	\$250.00	1.1	\$275.00
04/19/2024	TF	Court Attendance	Trial	\$250.00	8.0	\$2,000.00
04/19/2024	TF	Drafting Motion	Drafting mjmol	\$250.00	3.0	\$750.00
04/19/2024	JM	Trial Preparation	Attend day 10 of trial; debrief w/ Plaintiff's team; assist w/ JMOL; review D's JMOL; review Jury question 1; legal research re: same; present re: same	\$500.00	10.9	\$5,450.00
04/22/2024	MP	Court Attendance	Court attendance re: jury's questions.	\$110.00	1.0	\$110.00
04/22/2024	AC	Court Attendance	Jury Question #2	\$250.00	0.9	\$225.00
04/22/2024	JM	Trial Preparation	Attend court re: jury questions; continue to review D's JMOL; legal research re: same	\$500.00	3.1	\$1,550.00
04/23/2024	JM	Court Attendance	Attend court to receive verdict and argue JMOLs; debrief w/ Plaintiffs' legal team re: next steps	\$500.00	2.0	\$1,000.00
04/24/2024	MP	Court Attendance	Court attendance re: jury verdict.	\$110.00	1.0	\$110.00
04/30/2024	MP	Administrative	Arranging payments to court reporters and witnesses.	\$110.00	0.7	\$77.00
04/30/2024	AC	Court Attendance	Jury verdict	\$250.00	1.2	\$300.00
05/09/2024	TF	Drafting Motion	Drafting notice/proposed final orders with respect to Daggett County	\$250.00	4.0	\$1,000.00
05/09/2024	JM	Drafting Motion	Assist w/ drafting motion re: final order, legal research re: same	\$500.00	0.8	\$400.00

05/10/2024	JM	Drafting Motion	Complete research and drafting assistance re: motion	\$500.00	0.7	\$350.00
05/16/2024	MP	Document Review	Review Porter default motion against Cox.	\$110.00	0.6	\$66.00
05/17/2024	JM	Research	Review D's objection to final judgement; legal research re: same	\$500.00	1.4	\$700.00
05/21/2024	TF	Research	Research for response to Daggett's objection to Plaintiffs' proposed final notice	\$250.00	4.0	\$1,000.00
05/22/2024	TF	Drafting Motion	Drafting response to Daggett's objection to Plaintiffs' proposed final judgment	\$250.00	6.0	\$1,500.00
05/23/2024	TF	Drafting Motion	Drafting Motion for Attorneys' Fees	\$250.00	4.3	\$1,075.00
05/29/2024	JM	Document Review	Review Court's judgement	\$500.00	0.2	\$100.00
06/07/2024	AC	Research	Appeal Research (deadlines, fees, etc)	\$250.00	0.7	\$175.00
06/11/2024	JM	Drafting Motion	Start to prepare memo and affidavit re: bill of costs	\$500.00	1.3	\$650.00
06/12/2024	JM	Drafting Motion	Complete memo and affidavit re: bill of costs; review Daggett and other D's bills of costs and related memos; legal research re: same	\$500.00	1.6	\$800.00
06/19/2024	AC	Drafting Motion	Drafting response to Defendant's motions to redact Jorgensen's plea and personal identifiers	\$250.00	0.6	\$150.00
06/20/2024	AC	Research	Research for sealing expunged records post-trial	\$250.00	0.8	\$200.00
06/20/2024	AC	Drafting Motion	Drafting response to Defendant's motions to redact jorgensen's plea and personal identifiers	\$250.00	3.5	\$875.00
06/24/2024	MP	Document Review	Review of defendant's bill of costs, compare to receipts and invoices provided.	\$110.00	0.8	\$88.00
06/24/2024	JM	Drafting Motion	Work on draft objections to bills of cost	\$500.00	1.0	\$500.00
06/25/2024	JM	Drafting Motion	Review Daggett's motion to alter or amend; legal research re: same; work on draft objections to Defs' bills of costs	\$500.00	2.5	\$1,250.00
06/26/2024	MP	Document Review	Proofreading and edits to objections to sheriff defendants bill of costs, filing with court, and updating internal files.	\$110.00	1.0	\$110.00
06/26/2024	MP	Document Review	Edits to objection to Daggett's bill of costs, filing with court, and updating files.	\$110.00	1.2	\$132.00
06/26/2024	JM	Drafting Motion	Begin drafting response and research on motion to alter or amend; finalize P's objections to bills of cost; review D's objections to P's bill of costs	\$500.00	3.4	\$1,700.00
06/28/2024	JM	Drafting Motion	Draft response to Daggett's motion to alter or amend; legal research re: same; begin drafting attorney fee motion	\$500.00	3.8	\$1,900.00
07/02/2024	MP	Document Review	Proofread and edits to motion for attorneys fees.	\$110.00	0.7	\$77.00
07/08/2024	JM	Drafting Motion	Continue research and drafting response re: D's motion to alter or amend	\$500.00	1.6	\$800.00
07/09/2024	MP	Document Review	Review response to motion to alter/amend.	\$110.00	0.7	\$77.00
07/09/2024	JM	Drafting Motion	Finalize research and drafting response to D's motion to alter or amend; begin draft reply re: bill of costs	\$500.00	1.1	\$550.00
07/10/2024	JM	Drafting Motion	Review D's reply ISO bill of costs; continue reply ISO P's bill of costs	\$500.00	0.9	\$450.00
07/11/2024	JM	Drafting Motion	Complete reply ISO P's bill of costs; draft motion to file late	\$500.00	1.3	\$650.00
07/23/2024	JM	Document Review	Review and approve stipulated extension motion by Ds	\$500.00	0.3	\$150.00



07/30/2024	JM	Document Review	Review D's reply ISO motion to alter or amend; legal research re: same	\$500.00	1.9	\$950.00
09/20/2024	JM	Document Review	Review billing records and affidavit ISO attorney fees	\$500.00	2.5	\$1,250.00
09/26/2024	AC	Drafting Motion	Drafting notice of voluntary dismissal for Drollette and Asay against Cox and Toledo	\$250.00	0.6	\$150.00
09/30/2024	AC	Administrative	Proofreading and filing voluntary dismissal for Drollette and Asay against Cox and Toledo	\$250.00	0.4	\$100.00
03/04/2025	TF	Drafting Motion	Drafting Final Atty Fees Motion	\$250.00	2.3	\$575.00
03/08/2025	TF	Drafting Motion	Revising/Editing Atty Fees Motion	\$250.00	6.0	\$1,500.00

Totals: **2325.5** **\$766,075.00**